



BECHTEL NATIONAL INC.

## CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

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 Naval Facilities Engineering Command  
 Southwest Division  
 Mr. Richard Selby, Code 57CS.RS  
 Building 127, Room 112  
 1220 Pacific Highway  
 San Diego, CA 92132-5187

DATE: August 4, 1997CTO #: 142LOCATION: MCAS El Toro

FROM:

*[Signature]*  
 D. J. Tedaldi, Ph.D., P.E., Project Manager

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Draft Quality Assurance Project Plan, DTD June 1997

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**RESPONSE TO COMMENTS  
DRAFT GROUNDWATER REMEDIATION WORK PLAN  
AND DRAFT QUALITY ASSURANCE PROJECT PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Glenn R. Kistner, RPM USEPA</p> <p><b>To:</b> Joseph Joyce BRAC Environmental Coordinator</p> <p><b>Date:</b> 3 June 1997</p>	<p><b>CLEAN II Program</b> <b>Contract No. N68-711-92-D-4670</b> <b>CTO-0142</b> <b>File Code: 0222</b></p>
<p><b><u>COMMENTS</u></b></p> <p><b>1A. <u>General</u></b> - The WP references the 1995 BNI FSP and CLEAN II standard operating procedures (SOPs) for sampling related information. It is recommended that the WP indicate the specific sections of the 1995 BNI ESP being referenced. The WP should also state that the BNI 1995 FSP will be available on site.</p>	<p><b><u>RESPONSES TO COMMENTS</u></b></p> <p><b>RESPONSE 1:</b> Specific guidance documents for field work include the Final Phase II Work Plan, Final Field Sampling Plan, Final Data Quality Management Plan, Technical Memorandum for the Final Data Quality Management Plan, Final Investigation-derived Waste Management Plan, Navy CLEAN II Standard Operating Procedures, and the Draft Final Groundwater Remediation Pilot Test Quality Assurance Project Plan. All of these documents will be available at the field office at MCAS El Toro.</p>
<p><b>1B.</b> It is recommended that the QAPP include an approval page for signatures of those expected to officially approve the document. The QAPP should also include a distribution list of persons and organizations receiving copies of the approved documents and revisions.</p>	<p><b>RESPONSE 1B:</b> An approval page for signatures is required of all Navy CLEAN documents and will be included with this QAPP. A distribution list is provided with each QAPP deliverable.</p>
<p><b>2. <u>QAPP: Section 3.2.1, Detection Limits; Appendix B: Table B-1, Project Required Detection Limits by Methods</u></b> - The QAPP discusses situations where detection limits are higher than the preliminary remediation goals (PRGs) listed in Table B-1 and states that the required compound list and performance criteria of the listed methods must be satisfied by alternative methods. However, the QAPP does not identify alternative methods for the instances where the detection limit is greater than the PRG. This issue should be resolved before sampling activities begin.</p>	<p><b>RESPONSE 2:</b> The COPCs for CTO-142 will have detection limits which will satisfy PRGs. All methods used under this project are the same methods used previously under CTO-73 which received Navy and Regulatory approval. In all cases, the best available technology will be used.</p>
<p><b>3. <u>QAPP: Section 6.2.2, Performance Evaluation Samples</u></b> - Section 6.2.2 states that performance evaluation (PE) samples may be submitted to the fixed base laboratory through the routine NFESC evaluation process or through the Navy CLEAN Performance Evaluation and Proficiency Testing Program. The QAPP should state the conditions that double blind PE samples will be submitted. It is recommended that the QAPP indicate that PE samples will be</p>	<p><b>RESPONSE 3:</b> The CLEAN subcontract laboratory (EMAX) routinely participates in quarterly or annual PE programs, including Army Corps of Engineers, HAZWRAP, EPA WS/WP and the California ELAP Hazardous Waste PE programs. Double blind performance evaluation (DBPE) samples are not required by this QAPP. DBPE sampling is not a Region IX requirement and other EPA regions do not request that this procedure be initiated. El Toro's sampling program has followed a defensible and thorough</p>

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<p>submitted.</p>	<p>QA/QC program over the past 6 years under both the California certified and CLP programs that have already been deemed valid for CERCLA programs. El Toro's sampling program is nearly 95 percent complete. Multiple laboratories have been used and PE samples from the latest laboratory will not provide a valuable measure of the program's quality at this late date. El Toro also makes use of groundwater data collected from local water districts. DBPE samples may have the effect of drawing into question all non-CERCLA data that is tracked and validated for quality under different environmental programs. Further, because the environmental program is nearly complete at El Toro, the groundwater data are being used more for tracking than decision making. If authorized by the SWDIV Quality Assurance Officer, the PE samples may be submitted through the Navy CLEAN Performance Evaluation and Proficiency Testing Program.</p>
<p>4. <u>QAPP: Table 3-1, Tolerance Limits for Field Measurements; Appendix A: Table A-1, Field Screening Instruments and Typical Detection Ranges</u> - Table 3-1 of the QAPP specifies a tolerance limit of <math>\pm 3</math> nm (nanometers) for anion analysis and Table A-1 of Appendix A specifies a detection range of 400-900 nm for cation, anion, and bacteria analyses by Hach kits. Nanometers refer to the wavelength monitored by the colorimeter, not analyte concentration. These tables should be revised to indicate tolerance and detection limits in concentration units, e.g., mg/L.</p>	<p><b>RESPONSE 4:</b> Detection limits for Hach kits have been incorporated.</p>
<p>5A. <u>QAPP: Table 4-1, Analytical Parameters, Sample Containers, Preservatives, and Holding Times for Organics and Inorganics</u> - Table 4-1 should be revised to indicate that samples collected for total dissolved solids (TDS), total suspended solids (TSS), and alkalinity will be preserved by cooling to <math>4^{\circ}\text{C} \pm 2^{\circ}</math>. Samples collected for these analytes should not be preserved with acid.</p>	<p><b>RESPONSE 5A:</b> This error has been corrected in Table 4-1.</p>
<p>5B. The holding time for TDS and TSS in Table 4-1 should be revised from 28 to 7 days; the holding time for alkalinity should be revised from 28 to 14 days, as per Table II of Part 136.6 of 40 CFR. In addition, for samples where nitrate is not preserved, the holding</p>	<p><b>RESPONSE 5B:</b> This error has been corrected in Table 4-1.</p>

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<p>time should be 48 hours.</p>	
<p><b>5C.</b> It is recommended that one vial from each aquifer be pH tested to confirm that sufficient hydrochloric acid has been added to the vial to obtain a sample pH of &lt;2. The pH check vial should be discarded.</p>	<p><b>RESPONSE 5C:</b> pH of samples is checked in the field and upon arrival at the laboratory. Additional HCl is added at the laboratory to samples under controlled conditions within the 7-day holding time.</p>
<p><b>6.</b> <u>QAPP: Section 6.3, Standard Operating Procedures</u> - Section 6.3 lists the relevant SOPs for the project. Agency guidance requires that all SOPs be included with the QAPP. The QAPP should indicate that the SOPs are mandatory reading and will be available on site.</p>	<p><b>RESPONSE 6:</b> Controlled copies of SOPs has been provided to EPA, DTSC and the Navy and are also available at the field office at MCAS El Toro.</p>
<p><b>7A.</b> <u>QAPP: Section 7.2, Data Verification and Validation</u> - Section 7.2 indicates that an independent subcontractor will perform data validation. The subcontractor relationship should be depicted in the organization chart.</p>	<p><b>RESPONSE 7A:</b> Subcontractors are not included in organization chart as the actual subcontractor is unknown and can change.</p>
<p><b>7B.</b> It is recommended that this section include the documentation required from the laboratory. This should include the sufficient documentation to perform full data validation, including quality control (QC) summaries, bench sheets, sample and standard preparation logs, and raw data. The QAPP should also stipulate that gas chromatography/mass spectrometry (GC/MC) tapes will be made available upon request by EPA.</p>	<p><b>RESPONSE 7B:</b> Levels III and IV data validation requirements have been incorporated into Section 7.2. The CLEAN laboratories, as a practice, store all magnetic tapes.</p>
<p><b>8.</b> <u>QAPP: Section 8.1, Performance and System Audits</u> - Section 8.1 should state that copies of laboratory audit reports summarizing auditing activities and findings, and any corresponding corrective actions that were implemented as a result of these audit activities, should be submitted to EPA Region IX.</p>	<p><b>RESPONSE 8:</b> Copies of laboratory audits are submitted to the Navy/SWDIV and are available upon request.</p>
<p><b>9.</b> <u>WP: Section 3.5.2, Laboratory Analysis</u> - Section 3.5.2 lists alkalinity, carbonate, and bicarbonate by EPA Method 310.1. EPA Method 310.1 determines total alkalinity; if the carbonate and bicarbonate fractions are desired, it is recommended that the</p>	<p><b>RESPONSE 9:</b> A modified EPA Method 310.1 has been used to provide alkalinity, bicarbonate and carbonate fractions on the CLEAN program. It has been a CLEAN programmatic practice to use EPA methodology whenever possible.</p>

