PROJECT NOTE NO.	PROJECT NO.
PN-0249/250-38 CLE-C01-01F249/250-I2-0020	01-F249/250-YS

CONFIRMATION OF:	CONFERENCE		DATE HELD	15 July 1993
	TELECOM	X	DATE ISSUED	20 July 1993
	OTHER		RECORDED BY	Kathy Brewer/CH2M HILL KMB
			PLACE	Santa Ana

SUBJECT

Contract Task Order (CTO) No. 249/250
Comment Review Meeting
Naval Complex Long Beach RI/FS Work Plans

PARTICIPANTS: (* DENOTES PART-TIME ATTENDANCE)

J. Joyce - Code 1832.JJ
C. Leadon - Code 1852.CL
J. Corbett - Code 1852.JC
C. A. Ulaszewski - LBNSY
K. Brewer - CH2M HILL

ACTION REQ'D. BY	ITEM

A meeting was held on 15 July 1993 at 1000 hours to discuss comments received from the Navy and the California Department of Toxic Substances Control (DTSC) on the Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plans in preparation for the comment resolution meeting with DTSC on 19 July. These meeting minutes summarize the discussion.

Several comments were received on the screening risk assessment methodology used for soils in the Work Plans. The differences between the approach used for Naval Complex (NC) Long Beach and those used for the Marine Corps Air Station (MCAS) El Toro and the Environmental Protection Agency (EPA) Region IX preliminary remedial goals (PRG) were discussed (see attachment). It was decided that the approach used for El Toro would be adopted since it has been well received on that project. This approach considers four exposure pathways for both the residential and industrial exposure pathways: ingestion, inhalation of volatiles, inhalation of dusts, and dermal contact.

The El Toro method and the Region IX PRG method both incorporate nonrisk based limits on acceptable concentrations in some instances. For volatile compounds, the risk based concentration (RBC) is set at C_{sat} if the C_{sat} is less than the derived RBC. Also, for compounds with have RBCs greater than 10^5 mg/kg (10 percent), the limit is set at 10^5 mg/kg. It was decided that these conventions would also be incorporated into the NC Long Beach RBCs since they provide a consistently conservative approach.

The exposure parameters used for El Toro will be examined to determine if they are applicable for NC Long Beach. Any changes will be discussed in the meeting on 19 July. Also, the California Environmental Protection Agency (CAL EPA) toxicity factors

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will be used in conjunction with the EPA toxicity factors as was done previously. J. Corbett stated that Southwest Division, Naval Facilities Engineering Command (SWDIV) has agreed to carry out the duel analysis at this time on Camp Pendleton and NC Long Beach, with the caveat that a final determination on the applicability of the CAL EPA toxicity factors has not been made.

DTSC comments on the sampling planned for Site 4 and Site 12 were reviewed. In both instances, DTSC would like to see sampling in areas where a release has not been confirmed. The Navy is hesitant to set a precedent by extending the sampling program to those areas. If DTSC's concerns can be addressed with minimal additional sampling (e.g., five additional surface soil samples), then the sampling will be added. However, if they are requesting more extensive sampling efforts (e.g., multiple well installations or soil borings) then an effort will be made to reach a compromise position.

A. Ulaszewski commented that the boundaries of Site 12 need to be clarified on the maps. She would also like to see the Former Quonset Hut location at Site 9 identified on the maps, if possible.

J. Corbett still needs to review the Draft Health and Safety Plans (HSPs). She will also review DTSC's comments on the HSPs and indicate whether she agrees or disagrees with the comments.

C. Leadon said that he would like to see some discussion of use of a horizontal dispersion model in the development of cleanup criteria for groundwater. K. Brewer said that the discussion of the screening criteria for groundwater would be expanded to include discussion of this concept.

One of DTSC's reviewers questioned the need to do background sampling for soil and groundwater since he felt that the current data set from the Site Inspection (SI) could be used to establish the ambient levels of metals in the area. K. Brewer explained that except for the two locations identified as "background" in the SI, all of the samples were collected from identified areas of contamination, making it difficult to establish whether the metals levels detected are reflective of ambient conditions. The background sampling program for subsurface soil and groundwater utilizes monitoring wells that would be installed for the facilitywide water level monitoring network. The only cost savings that would be realized from eliminating these background samples is the analytical cost. C. Leadon said that he felt that it was important to establish background concentrations.

Several reviewer's at DTSC requested that information about active and abandoned oil wells in the area be added to the Work Plans, since these wells provide potential conduits for contamination in the shallow zone groundwater to travel to underlying aquifers. A. Ulaszewski said that she would contact the City of Long Beach to find out what data is available on those wells.

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K. Brewer said that she would have copies of the data quality objective tables and sampling diagrams to facilitate the discussion on 19 July. The meeting adjourned at 1500 hours.

Nonparticipant Distribution

R. Green - Code 0232
K. Reynolds - Code 1841
A. Lee - Code 1832.AL
D. Villanueva - Code 0232.DV
G. Guha - JEG/Pas
R. Udabe - JEG/Pas
K. Tomeo - CH2M HILL
P. Torrey - CH2M HILL
B. Wong - CH2M HILL
K. Fredrickson - CH2M HILL
File - CTO Notebook/PMO
File - PMO
File - CH2M HILL

Attachment

SCREENING RISK ASSESSMENT METHODOLOGY COMPARISON

NC Long Beach Screening Risk Assessment

- Residential scenario includes ingestion pathway only. Inhalation of volatiles and dust are not included per RAGS. Uses time-weighted average for children and adults.
- Industrial scenario includes ingestion, inhalation of volatiles, and inhalation of dust, per RAGS. Assumes adult exposure for carcinogens and noncarcinogens.
- Assumes all carginogenic PAHs are equitoxic with benzo(a)pyrene.

El Toro Screening Risk Assessment

- Residential scenario includes ingestion, inhalation of volatiles, inhalation of dusts, and dermal contact. Uses a time-weighted average for children and adults.
- Incorporates C_{sat} limitation for volatile organics.
- Assumes all carginogenic PAHs are equitoxic with benzo(a)pyrene.

Region IX PRGs

- Residential scenario includes ingestion and inhalation of volatiles. Assumes adult exposure for carginogens and volatile noncarcinogens. Assumes child exposure for non-volatile noncarcinogens but uses chronic toxicity factors.
- Industrial scenario includes ingestion and inhalation of volatiles. Assumes adult exposure for carcinogens and noncarcinogens.
- Incorporates C_{sat} limitation for volatile organics.
- Uses newly issued equivalency factors for carcinogenic PAHs.