



PROJECT NOTE NO. PN-0145-110 CLE-C01-01F145-I2-0076	PROJECT NO.
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CONFIRMATION OF:	CONFERENCE X TELECOM OTHER	DATE HELD	24 January 1994
		DATE ISSUED	18 February 1994
		RECORDED BY	Davi Richards/CH2M HILL
		PLACE	San Diego
SUBJECT	Contract Task Order (CTO) No. 145 MCAS El Toro Remedial Investigation/Feasibility Study (RI/FS) Operable Unit (OU)-1 ARARs		

PARTICIPANTS: (* DENOTES PART-TIME ATTENDANCE)

Rex Callaway/Code 09C.RC
 Andy Piszkin/Code 1831.AP
 Davi Richards/CH2M HILL
 Renu Gupta/CH2M HILL
 John Dolegowski/CH2M HILL
 Hooshang Nezafati/CH2M HILL

ACTION REQ'D. BY	ITEM
	<p>The goal of this meeting was to obtain feedback from R. Callaway/Code 09C.RC on the draft Applicable or Relevant and Appropriate Requirements (ARARs) prepared by CH2M HILL for Operable Unit (OU)-1, regional groundwater contamination, and to plan strategy for the OU-1 Feasibility Study (FS). The meeting lasted from 0930 to 1200 hours and from 1330 to 1600 hours. A. Piszkin/Code 1831.AP was present for only the last hour of the meeting. These meeting notes have primarily summarized decisions reached and action items identified during the meeting.</p> <p><u>Decisions</u></p> <ol style="list-style-type: none"> The definition of OU-1 will remain "all contamination originating from sites at Marine Corps Air Station (MCAS) El Toro that has migrated into the regional groundwater system." This definition first appeared in a position paper dated 15 February 1993, reflecting discussion and consensus at the Remedial Project Manager meeting in January 1993. It was discussed again and agreed to in July 1993. Assuming that CH2M HILL's analysis of the groundwater data will confirm the view that MCAS El Toro sites are not point sources of total dissolved solids (TDS), nitrates, selenium, herbicides and pesticides, the result will be that volatile organic compounds (VOCs) are the only group of chemicals that fit this definition. OU-1 will address only those parts of the Orange County Water District (OCWD) Irvine Desalter Project that deal with VOCs: groundwater extraction and conveyance, facility siting, and treatment for VOC removal. For effluent streams containing VOC residuals (e.g. treated water and treatment residuals [brine, carbon]), ARARs will be identified only for the VOC constituents. The regulation of other constituents, both in the aquifer and in the extracted groundwater, is outside the scope of OU-1.

JACOBS ENGINEERING GROUP INC.

CLEAN TRANSMITTAL/DELIVERABLE RECEIPT

CONTRACT N-68711-89-D-9296

Doc. Control Number: CLE-C01-01F145-I2-0076

TO: Ms. Robin Green
Contracting Officer, Code 0232.RG
Naval Facilities Engineering Command
Southwest Division
Contracts Dept., Room 135
1220 Pacific Highway
San Diego, California 92132-5187

DATE: 18 February 1994
CTO#: 0145
LOCATION: Santa Ana
TASK/WORK ELEMENT: _____

FROM: 
John Dolegowski/Project Manager


John Caldwell/Quality Control Manager

DESCRIPTION: CTO 145 MCAS El Toro Remedial Investigation/Feasibility Study (RI/FS), Operable Unit (OU)-1 ARARs.

TYPE: Contract Deliverable CTO Deliverable Request For Change/Project Note

CATEGORY: Preliminary Draft Draft Preliminary Final Final

SCHEDULED DELIVERY DATE: _____ ACTUAL DELIVERY DATE: _____

Number of Copies Submitted to Navy: _____

Copies To: K. Reynolds - Code 1841 w/ attach ^{K.} File - PMO w/attach
A. Piszkin - Code 1812.AP w/attach File - CTO Notebook/PMO w/o attach
J. Allen - Code 0232.JA w/o attach File - CH2M HILL w/attach
C. Mitchell - MCAS El Toro w/o attach K. Tomeo - CH2M HILL w/attach
K. Frederickson - CH2M HILL w/o attach B. Zanjani - CH2M HILL w/attach

Delivered To: Contracting Officer RPM/EIC Date/Time Received

Name: _____

FEB 25 1994



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Action Items

1. D. Richards/CH2M HILL will revise the draft descriptions of the alternatives as requested by R. Callaway and fax a copy to A. Piszkin to be used as an attachment to a letter to the state agencies requesting identification of ARARs for OU-1.
2. Following completion of the analysis of the distribution of TDS, nitrates, selenium, herbicides, and pesticides, CH2M HILL will draft a letter for transmittal from the Navy to the agencies that will:
 - State the definition of OU-1
 - Identify VOCs as meeting the definition of OU-1
 - Briefly summarize the analysis of TDS, nitrates, selenium, herbicides and pesticides
 - Briefly identify/summarize other known contamination that will be investigated further in Phase II and evaluated for remediation in subsequent OUs or under other environmental programs at the Station (e.g. underground storage tanks), for instance, elevated TDS at Site 16, Trichloroethylene at Sites 2 and 3/4, nickel and cadmium at Sites 7 and 12.
 - State the remedial action objectives (non-numeric) for OU-1
3. CH2M HILL will draft a letter for transmittal from the Navy to OCWD to point out that OCWD will be responsible for fulfilling federal and state ARARs that are identified for the Desalter Project portion of OU-1. This letter will contain a preliminary list of potential federal and state ARARs.
4. R. Gupta/CH2M HILL will check the Santa Ana Regional Water Quality Control Board's (RWQCB) Basin Plan to see whether it contains numeric standards for organic chemicals.
5. D. Richards and R. Gupta will call Roy Herndon/OCWD to ask for any environmental planning documentation he can provide to help with the ARARs analysis for OU-1 (i.e., preliminary permitting documentation for air emissions and brine discharge; recent predesign reports; and backup documentation for ecological, archaeological, and historical surveys).
6. R. Gupta will check with the state agency to ask whether a phone call to the state to check the state's database of archaeological and historical sites by a certified archaeologist is sufficient action to comply with the ARAR.
7. CH2M HILL will revise the draft ARARs writeup following (1) the State response to the Navy's request for ARARs, and (2) R. Callaway's review of state ARARs for Pendleton.



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- 8. CH2M HILL will include, in the next draft of the ARARs writeup, a brief (one to two pages) technical explanation of why it is not feasible to reach background levels in an aquifer with organic contamination.
- 9. The Navy will fund CH2M HILL to draft the Record of Decision.
- 10. R. Gupta will send R. Callaway a copy of Jon Marshack's Central Valley RWQCB Compilation of Water Quality Goals. This report describes RWQCB's process by which numerical limits for water quality parameters and constituents may be selected to protect beneficial uses of the surface and ground waters.
- 11. R. Gupta will check Title V of the Clean Air Act to see whether it contains provisions that might be ARARs.
- 12. CH2M HILL will include a schematic figure in the FS illustrating the relationship among OU-1, OU-2, and the Desalter.
- 13. R. Gupta will check to see that the Executive Orders identified in the draft ARARs writeup are included in 40 CFR Part 6; Executive Orders become ARARs by being referenced in 40 CFR Part 6;

Observations

D. Richards stated that Contract Task Order #0145 is not funded to verify OCWD's (a) compliance with ARARs, or (b) technical adequacy of the Desalter treatment system. FSs evaluate at a conceptual level, identifying potential fatal flaws and technical feasibility, not optimizing design. The Navy may want to arrange for technical review as part of its settlement with OCWD.

R. Callaway stated that we will need to evaluate the protectiveness of the cumulative risk posed by VOCs in the groundwater at whatever levels are determined to be the remedial goals. As a starting point, we need to look at the cumulative risk of the detected VOCs if they are present at their Maximum Contaminant Levels.

Nonparticipant Distribution

- File - CTO Notebook/PMO
- File - PMO
- File - CH2M HILL