

<b>PROJECT NOTE NO.</b> PN-0145-190 CLE-C01-01F145-I2-0110	<b>PROJECT NO.</b> 01-F145-H6
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<b>CONFIRMATION OF:</b>	CONFERENCE X TELECOM OTHER	<b>DATE HELD</b> 28 June 1995 <b>DATE ISSUED</b> 06 July 1995 <b>RECORDED BY</b> John Dolegowski/CH2M HILL <b>PLACE</b> NAVFAC SWDIV	
<b>SUBJECT</b>	Contract Task Order (CTO) 0145 OU-1 Interim-Action Feasibility Study Planning Meeting (28 June 1995) MCAS El Toro Remedial Investigation/Feasibility Study		

**PARTICIPANTS: (\* DENOTES PART-TIME ATTENDANCE)**

Andy Piszkin - Code 1831.AP Walter Sandza - Code 185 Ginny Garelick - Code 1853.VG Rex Callaway - Code 09C.RC Dana Sakamoto - Code 183 John Dolegowski/CH2M HILL	Eric Banks/JEG Ken Tomeo/CH2M HILL** Davi Richards/CH2M HILL** Raoul Portillo/JEG** ** Attending by conference call
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CH2M HILL	<p>A meeting was held on 28 June 1995 to discuss implementation of the aggressive schedule to complete the Marine Corps Air Station (MCAS) El Toro Operable Unit (OU)-1 Interim-Action Feasibility Study (IAFS) and IAFS technical issues. The schedule for the CLEAN I Project Team to complete the OU-1 IAFS was reduced on 16 June 1995 from the planned 123 days to 63 days in order to comply with requests from the U.S. Environmental Protection Agency (EPA) to support completion of the OU-1 Record of Decision (ROD) (including agency signatures) by 28 September 1996.</p> <p><u>Implementation of IAFS Schedule</u></p> <p>John Dolegowski/CH2M HILL summarized how the Draft OU-1 IAFS will be completed in time for submittal for formal Navy review on 22 August 1995. Key issues summarizing how the report will be completed within the compressed time frame are provided on the attached agenda. Additional staff have been added in the CH2M HILL offices in both Corvallis, Oregon and Santa Ana, California. Mike Arends/CH2M HILL will take over some of the project management activities for Contract Task Order (CTO) 0145 from J. Dolegowski in order to free up some of his time to concentrate more on technical issues. A detailed schedule has been prepared to track the weekly progress in order to ensure that the report stays on schedule.</p> <p>Eric Banks/Jacobs Engineering Group Inc. (Jacobs) stated CH2M HILL should identify administrative overtime ahead of time so that it can be preapproved.</p> <p>J. Dolegowski stated that the compression of the schedule has significantly reduced the flexibility on important technical issues; therefore, it is important that the project team not change direction on key issues while the report is being written. J. Dolegowski asked that all Navy review comments be submitted to CH2M HILL through Andy Piszkin/Code 1831.AP in order to promote resolution of a unified Navy position. When asked by Ken Tomeo/CH2M HILL whether there were any IAFS issues</p>
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that currently needed resolution in order to not hold up the IAFS schedule, J. Dolegowski replied that CH2M HILL needed to know (1) If Alternatives 6A and 6B will be carried forward to detailed analysis, (2) Navy input on the presentation of cost data for the IAFS alternatives (to be discussed at a planned meeting with the Navy on 12 July 1995), (3) Whether the agencies had agreed to proceed with the IAFS based on two rounds of groundwater monitoring data, and (4) Whether conclusions on background concentrations of inorganics in groundwater would be included in the IAFS Report and the OU-1 Remedial Investigation (RI) Report.

Groundwater Monitoring Data Needed to Support the RI/FS

At the meeting held at EPA on 16 June 1995 with Navy and EPA representatives to discuss the MCAS El Toro Federal Facilities Agreement (FFA) schedule extension, EPA expressed doubts about proceeding with the OU-1 ROD with only two rounds of groundwater monitoring and without unfiltered groundwater samples. On 28 June 1995, Dana Sakamoto/Code 183 stated that Julie Anderson/EPA expressed concern about background concentrations of total dissolved solids (TDS) and nitrate in groundwater and about applicable or relevant and appropriate requirements (ARARs) and cleanup requirements for nitrate (i.e. whether the cost of nitrate removal from the pumped groundwater should be included in the IAFS cost analysis as it was in the San Fernando Valley ROD and the Baldwin Park ROD). J. Anderson also stated that EPA would like Orange County Water District (OCWD) to implement the remedial action for OU-1 because OCWD would have a long-term presence in the area.

At this meeting, the CLEAN Project Team was notified that Jim Pawlisch/Code 18 told EPA on 16 June 1995 that the Navy would submit a document focusing on background concentrations of TDS/nitrate within 30 days. Walter Sandza/Code 185 suggested that the report be submitted as a Remedial Investigation (RI) Report Addendum. D. Sakamoto agreed.

Navy

Navy provide technical direction regarding additional deliverable focusing on background concentrations of TDS/Nitrates.

ROD Status/OU-1 Definition

At the 16 June 1995 meeting, Bonnie Arthur/EPA stated that she would like to delay the OU-1 ROD until two additional rounds of groundwater monitoring data are obtained. On 28 June 1995, W. Sandza suggested that an RI addendum could be submitted in the spring of 1996 that summarized the two new rounds of data if the agencies insisted upon having the information. J. Dolegowski expressed concern that the regulatory agencies may express reservation about accepting the OU-1 ROD 1 year from now unless the Navy proves that the inevitable changes in groundwater quality do not constitute significant changes to the OU-1 RI/FS. This may result in a lot of additional work and unanticipated delays. Rex Callaway/Code 09C.RC agreed and suggested sending the regulatory agencies a letter requesting formal agency concurrence as to whether the OU-1 FS is interim or final based on two rounds of groundwater monitoring data. W. Sandza and R. Callaway would like to get a final ROD for volatile organic compounds (VOCs) in groundwater. R. Callaway stated that there is nothing to prohibit having an interim ROD with final ARARs for VOCs. D. Sakamoto suggested that the Navy ask for concurrence on the ROD status for OU-1

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when the final FFA extension letter is submitted. D. Sakamoto stated that a protocol for resolution of issues with the regulatory agencies is needed.

R. Callaway stated that a schedule for the final ROD for groundwater does not exist. J. Dolegowski stated that Davi Richards/CH2M HILL submitted a proposed structure of RODs for MCAS El Toro that included a future resolution of inorganics in groundwater at the 13 April 1995 agency meeting for CTO 0145. The group discussed whether to change the definition of OU-1 to include only VOCs in order to get a final ROD at this time. J. Dolegowski stated that even if OU-1 was defined to be only VOCs, the number of rounds of groundwater monitoring data would still be an issue.

Navy will send a letter to the regulatory agencies in early to mid-July stating the Navy position on the OU-1 definition and the overall basewide ROD strategy and asking for agency concurrence.

IAFS Cost Presentation

D. Richards summarized the purpose of the 12 July 1995 meeting with the Navy to discuss presentation of the cost of alternatives in the IAFS. Three issues need resolution:

1. **Variable Costs.** For some alternatives, wells and capital equipment have a dual purpose. A percentage of the cost will be assigned to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) remedial cost. The Navy needs to decide upon the percentage for the CERCLA response. CH2M HILL will have spreadsheets completed for the meeting, so that the net impact of the assigned percentages can be rapidly determined.
2. **Desalinization for ReInjection.** At the 31 May 1995 meeting with the Navy and CH2M HILL, the Navy asked that CH2M HILL proceed with evaluation of operation and maintenance (O&M) costs to desalinate groundwater to the TDS concentrations specified in the Basin Plan Water Quality Objectives (WQOs) in case the Santa Ana Regional Water Quality Control Board (RWQCB) changed its mind about permitting injection of VOC-stripped groundwater above the WQOs. R. Callaway stated that he submitted comments to the RWQCB on the revised Basin Plan and it appeared very likely that the new Basin Plan would not preclude reinjection on groundwater if it did not degrade existing groundwater quality.  
  
D. Richards stated that if there is no current need to generate these desalination costs, CH2M HILL would prefer to do it later due to the current heavy work load. It is estimated the costs would take 2 weeks to develop. A. Piszkin stated that there was no need for CH2M HILL to generate the costs now; they could be developed later if needed.
3. **Desalination Costs at the Irvine Desalter Project (IDP) Treatment Facility.** There has recently been discussion within the Navy as to whether the remedial alternatives costs should include desalination at the Desalter facility in alternatives that discharge extracted groundwater to it. R. Callaway stated that he had recently prepared a memorandum recommending that we don't include



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these costs for desalinization for alternatives that include the Desalter. A. Piszkin directed CH2M HILL not to include these costs into the IAFS.

J. Dolegowski suggested that R. Callaway submit a memorandum describing the cost presentation strategy/methodology to the Navy Headquarters in early July in order to obtain their concurrence prior to completing the cost presentation for the internal draft IAFS. Navy Headquarters' concurrence would be needed prior to the planned 12 July 1995 cost presentation meeting, when final decisions will be made for the cost presentation to be included into the Navy review draft OU-1 IAFS Report.

Opportunities for Navy Input into the IAFS

J. Dolegowski discussed the opportunities for Navy input into the IAFS, as summarized in the attached agenda. R. Callaway expressed his need to work collaboratively with CH2M HILL on all of the ARARs sections. Cindy Dahl/CH2M HILL and Kathy Brewer/CH2M HILL will be working with R. Callaway throughout July to finalize the ARARs and text. By the end of July, R. Callaway will have all pieces of the ARARs sections. D. Richards said that she will prepare the first draft of Section 1 (Introduction) this coming weekend and will provide a first draft for A. Piszkin by 07 July. R. Callaway will get Appendix B (ARARs) in pieces; the process has already started. R. Callaway asked for specific dates on which he will get sections.

C. Dahl  
 K. Brewer

C. Dahl and K. Brewer will have a conference call with R. Callaway on 29 June 1995 to discuss due dates for sections.

E. Banks stated that it is important that R. Callaway have enough availability to provide the timely review needed to stay on schedule. R. Callaway stated that he will be in the office on 29 June, 05-07 July, 12-14 July, and 17-21 July 1995. R. Callaway stated that he would like to get John Lucero/CH2M HILL involved in strategizing the IAFS.

J. Dolegowski

J. Dolegowski will work with J. Lucero to verify his availability to work on the OU-1 IAFS.

Ginny Garelick/Code 1853.VG asked that the internal review draft of the OU-1 IAFS be received at Southwest Division, Naval Facilities Engineering Command (SWDIV) by 7:00 a.m. on 07 August 1995, so that she has 2 full days to review the document.

Agency Concurrence on ARARs

R. Callaway and D. Sakamoto would like to have a meeting with the regulatory agencies to obtain agency concurrence on unresolved ARARs issues. R. Callaway suggested a meeting on 13 or 14 July and asked if J. Lucero could attend. J. Dolegowski agreed that a meeting would be valuable, but reminded the group that each meeting takes 3 days away from the writing effort (1 day to prepare presentation, 1 day to attend, and 1 day to prepare meeting minutes). R. Callaway agreed and stated that CH2M HILL would not need to prepare a formal presentation or meeting minutes.

A. Piszkin

A. Piszkin will contact agencies to set up an ARARs meeting in mid-July 1995.

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J. Dolegowski	<p>J. Dolegowski will verify J. Lucero's and Cindy Dahl's availability to attend the July agency meeting.</p> <p>G. Garelick asked if CH2M HILL was still tracking the redrafting of the Basin Plan by the RWQCB. J. Dolegowski stated that Kimo Look/CH2M HILL had recently asked R. Callaway if he would like CH2M HILL to attend the next public meeting (07 July 1995) for the Basin Plan. R. Callaway said that he had not decided whether to attend the meeting himself and that he would notify CH2M HILL next week if he wanted them to attend.</p>
R. Callaway	<p>R. Callaway will provide direction to CH2M HILL to attend the 07 July 1995 RWQCB meeting, if desired, by 06 July 1995.</p> <p><u>IAFS Outline/Screening of Alternatives</u></p> <p>A. Piszkin asked which alternatives will be carried forward to detailed analysis in the IAFS. He asked if Alternatives 5A and 5B will be screened out. D. Richards said that CH2M HILL is proceeding with the direction received from the Navy on the 31 May 1995 meeting at SWDIV to screen out Alternative 5B but not 5A. She stated that if the Navy wants to screen out any additional alternatives, the project team needs direction by 07 July.</p> <p>R. Callaway stated that if the Navy can't settle with OCWD, then an argument is needed why the Desalter alternative was not selected. A. Piszkin stated that he would like to screen out Alternative 5A. He agreed to wait until the 12 July 1995 cost meeting to decide whether Alternative 5A will be screened out.</p> <p>The group discussed whether to include Alternatives 6a and 6b (requested by OCWD) in the IAFS. The Navy has had no opportunity to date to discuss these alternatives with OCWD or to evaluate their cost. D. Richards stated that evaluation of these alternatives must continue if they are to be included in the IAFS due to the rapid schedule. Since it appears unlikely that the Navy will be able to meet with OCWD to discuss any potential changes in the Alternatives 6a and 6b, A. Piszkin instructed the CLEAN Project Team to assume that no changes will be made to the alternatives as they are currently defined. A. Piszkin stated that SWDIV will consult with Navy Headquarters on 29 June 1995 and direct the CLEAN Project Team on whether Alternatives 6a and 6b will be included in the IAFS.</p>
A. Piszkin	<p>A. Piszkin will notify the CLEAN Project Team on Thursday, 29 June 1995 whether Alternatives 6a and 6b will be included in the IAFS.</p> <p><u>Background TDS Concentrations</u></p> <p>Further discussion continued on the presentation of information on background concentrations of TDS and nitrate in groundwater. W. Sandza stated that the scope of the FS Addendum would be to divorce the agricultural constituents from the background inorganics study that has already been completed. G. Garelick suggested that we look at the Argonne National Lab report completed for MCAS Tustin to look at the approach they used for evaluation of background concentrations in groundwater. A. Piszkin asked that we add anything we can to show that MCAS El Toro is not</p>



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responsible for agricultural contaminants (predominantly TDS and nitrate). He suggested that CH2M HILL focus on the Harvey Banks (1984) report and Roy Herndon's TDS plume migration projection. A. Piszkin mentioned that the inclusion of groundwater data from the entire MCAS El Toro has complicated the issue of background concentrations, because the agencies do not agree that the landfills have had no impact on groundwater. A. Piszkin stated that Larry Vitale/RWQCB thinks that most TDS is from agricultural activities and that the Navy tied too much of it to pyrite oxidation.

J. Dolegowski stated that resolution of the background concentrations of inorganics is needed before the proposed RI Addendum and the OU-1 RI Report is submitted. CH2M HILL needs to know (1) Whether to include the discussion of the nature and extent of inorganics in groundwater in the OU-1 RI Report, and (2) Whether the human health risk assessment should continue to include the cumulative risk of both VOCs and inorganics or be completely rewritten to include VOCs only. The OU-1 RI Report has already been significantly delayed due to delays in Navy and regulatory agency review and the agency's lack of consensus on background concentrations to the point where the agency review of the OU-1 RI Report and IAFS Report will overlap. A. Piszkin agreed that it would not be wise to prepare the FS Addendum until an overall approach to inorganics is developed and told J. Dolegowski to hold off on starting the FS Addendum. A. Piszkin stated that he would like to discuss the inorganics issues with the agencies at the planned mid-July agency meeting.

A. Piszkin

A. Piszkin will call the regulatory agencies to get their draft comments on the Technical Memorandum on MCAS El Toro Background Concentrations of Inorganic Constituents in Groundwater.

A. Piszkin

A. Piszkin will meet with J. Pawlisch and staff to discuss the overall technical approach for inorganics in groundwater for OU-1 in order to resolve items (1) and (2) above.

# JACOBS ENGINEERING GROUP INC.

## CLEAN TRANSMITTAL/DELIVERABLE RECEIPT

CONTRACT N68711-89-D-9296

DOCUMENT CONTROL No.: CLE-C01-01F145-I2-0110

TO: Southwest Division  
Ms. Gena McClain, Code 0232  
Head, Environmental ACO I Branch  
Naval Facilities Engineering Command  
Contracts Department, Room 131  
1220 Pacific Highway  
San Diego, California 92132-5187

DATE: 6 July 1995  
CTO#: 0145  
LOCATION: MCAS El Toro  
TASK/WORK ELEMENT:

FROM:   
John Dolegowski/Project Manager

Ken Tomeo/ Resource Center Manager

DESCRIPTION: Project Note #190, OU1 Interim Action Feasibility Study Planning Meeting (28 June 1995), MCAS El Toro

TYPE:  Contract Deliverable  CTO Deliverable  Change Notice/Project Note  Other

VERSION: \_\_\_\_\_ REVISION #: \_\_\_\_\_

ADMIN RECORD Yes  No  Category \_\_\_\_\_ Confidential \_\_\_\_\_  
(PJM to identify)

NEGOTIATED DELIVERY DATE: \_\_\_\_\_ ACTUAL DELIVERY DATE: \_\_\_\_\_

Number of Copies Submitted: \_\_\_\_\_

Copies To:	J. Rogers - Code 18C1 w/ attach	R. Portillo - JEG/PAS w/ attach
	A. Piszkin - Code 1831.AP w/ attach	E. Reinert - JEG/PAS w/ attach
	W. Sandza - Code 185 w/ attach	M. Bitner - CH2M HILL/ABQ w/ attach
	J. Joyce - Code 1832.JJ w/ attach	K. Tomeo - CH2M HILL w/ attach
	G. Garelick - Code 1853.VG w/ attach	M. Huddleston - CH2M HILL w/ attach
	R. Callaway - Code 09C.RC w/ attach	D. Richards - CH2M HILL/CVO w/ attach
	D. Sakamoto - Code 183 w/ attach	File - PMO w/ attach
	E. Banks - JEG/PMO w/ attach	File - CH2M HILL w/ attach

Delivered To: Contracting Officer \_\_\_\_\_ RPM/EIC \_\_\_\_\_

Date/Time Received

Name: \_\_\_\_\_