

JACOBS ENGINEERING GROUP INC.

CLEAN I TRANSMITTAL/DELIVERABLE RECEIPT

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TO: Commanding Officer
Naval Facilities Engineering Command
Southwest Division
Ms. Alice Barker, Code 0232.AB
Contracts Department, Room 131
1220 Pacific Highway
San Diego, California 92132-5187

DATE: 09 January 1996
CTO#: 0145
LOCATION: MCAS El Toro

FROM: *John Dolegowski*
John Dolegowski/Project Manager

M. Ferbrache for...
Ken Tomeo/ Resource Center Manager

DESCRIPTION: Project Note #200, Minutes from meeting with regularatry agencies to discuss OU-1 IAFS
which was held on 20 December 1995.

TYPE: Contract Deliverable CTO Deliverable Request for Change/
Project Note Other
(Circle one)

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Copies To:	<u>J. Rogers - Code 185C1 w/attach</u>	<u>Y. Chuang - CH2M HILL/SDO w/attach</u>
	<u>A. Piszkin - Code 1831.AP w/attach</u>	<u>D. Richards - CH2M HILL/CVO w/attach</u>
	<u>J. Joyce - Code 1831.JJ w/attach</u>	<u>J. Lovenburg - CH2M HILL/SCO w/attach</u>
	<u>T. Warren - Code 0232.TW w/attach</u>	<u>K. Tomeo - CH2M HILL/SCO w/attach</u>
	<u>M. Bell - JEG/PMO w/o attach</u>	<u>M. Huddleston - CH2M HILL/SCO w/attach</u>
	<u>E. Reinert - JEG/PAS w/attach</u>	<u>File - PMO w/attach</u>
	<u>H. Nezifati - CH2M HILL/SCO w/attach</u>	<u>File - CH2M HILL w/attach</u>

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PROJECT NOTE NO. PN-0145-200 CLE-C01-01F145-I2-0115		PROJECT NO. 01-F145-H6	
CONFIRMATION OF:	CONFERENCE X TELECOM X OTHER	DATE HELD DATE ISSUED RECORDED BY PLACE	20 December 1995 10 January 1996 Davi Richards/CH2M HILL Santa Ana, California
SUBJECT	Contract Task Order (CTO) #0145 Remedial Investigation/Feasibility Study OU-1 Interim-Action Feasibility Study (IAFS) Meeting Marine Corps Air Station (MCAS) El Toro		
PARTICIPANTS: (* DENOTES PART-TIME ATTENDANCE)			
See attached list (Attachment 1)			
ACTION REQ'D. BY	ITEM		
	<p>A meeting was held on Wednesday, 20 December 1995, at approximately 1300 hours to discuss some of the comments from the U.S. Environmental Protection Agency (EPA), the California EPA Department of Toxic Substances Control (DTSC), and the Santa Ana Regional Water Quality Control Board (RWQCB) on the Marine Corps Air Station (MCAS) El Toro Draft Operable Unit 1 (OU-1) Interim-Action Feasibility Study (IAFS) submitted by the Department of the Navy (DON) for regulatory agency review on 15 October 1995.</p> <p>All six agency commenters made the observation that the Principal Aquifer components of the remedial alternatives were too aggressive (and costly) in proportion to the slight cancer risk (approximately 10^{-5}) posed by the trichloroethylene (TCE) detected in the Principal Aquifer to date. In the review comments, some reviewers suggested an alternative that includes aggressive remediation of the shallow groundwater and groundwater monitoring of the Principal Aquifer. The comments varied, however, and none of the commenters made specific suggestions as to how the document should be revised.</p> <p><u>GENERAL DISCUSSION OF ISSUES</u></p> <p>A. Piszkin introduced several issues that need to be resolved in order for DON to implement the agencies' suggestions:</p> <ul style="list-style-type: none"> o Applicable or Relevant and Appropriate Requirements (ARARs)/cleanup levels o Remedial action objectives o The role of risk in setting cleanup levels o Acceptability of natural attenuation <p>A general discussion followed. DON raised the following questions for agency feedback, but no conclusions were reached.</p>		

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ACTION REQ'D. BY	ITEM
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1. EPA comments state that decisions for remediation are based on existing risk and that the risk in the Principal Aquifer is within EPA's "acceptable" cancer risk range, i.e., below 10^{-4} . Does this indicate that no action is required in the Principal Aquifer?
2. DTSC and the RWQCB suggest no action (other than monitoring) in the Principal Aquifer at this time because this is an interim action leading to an interim Record of Decision (ROD). Is this position consistent with EPA's comments and approach to the ROD?
3. If the maximum concentration of TCE detected in the Principal Aquifer to date is not exceeded in the future but TCE continues to migrate, thus raising concentrations in areas where no TCE or only trace concentrations have been found to date, is this acceptable?
4. Should the newly collected Phase II Remedial Investigation (RI) data be incorporated into the OU-1 IAFS?

The following comments were made during the discussion:

1. L. Vitale/RWQCB: The Federal Maximum Contaminant Level (MCL) for TCE may be raised to 50 micrograms per liter (ug/L) some time in the future. If the shallow contamination is prevented from migrating to the Principal Aquifer, the contaminant concentrations in the Principal Aquifer will be lowered by natural attenuation.
2. S. Beard/DTSC: Because recent data from the Phase II RI suggest that the source area (Site 24) contamination is shallow, the bottom of the well screen intervals for the shallow remedial wells should be shallower than assumed in the IAFS. The group consensus was that changes to well locations, depths, and pumping rates will be made on the basis of the most recent data during the remedial design/remedial action (RD/RA) phase.
3. B. Arthur/EPA: From a technical standpoint and on the basis of cost/benefit analysis, a new alternative to evaluate natural attenuation makes sense. However, remedies are sometimes selected because people in the affected community want them, rather than solely on the basis of a technical evaluation. A no-action ROD would provide for monitoring.
4. B. Arthur: EPA might want to see an approach that included natural attenuation with a cleanup goal of the MCL for TCE.
5. A. Piszkin/SWDIV: Negotiations between OCWD and DON would be more straightforward if there were a numerical groundwater cleanup goal.
6. B. Arthur: The OU-1 IAFS documents were well written and quite clearly communicated to EPA, in particular the cost/benefit analyses of the alternatives for the Principal Aquifer. In fact, EPA's new position on the Principal Aquifer is a direct result of CH2M HILL's demonstration of the cost/benefit analyses for these alternatives, based on the groundwater modeling results.

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	<p>7. A. Piszkin: He agreed with EPA's assessment of the quality of the IAFS report and added that the money was well spent by DON to conduct an expanded FS that included the evaluation of new alternatives that may eventually save millions of dollars for tax payers.</p> <p><u>AGREEMENTS ON ACTION</u></p> <ul style="list-style-type: none"> o A. Piszkin and B. Arthur suggested a meeting in San Francisco the week of 08 January 1996 to discuss the new alternative proposed by the regulators. A. Piszkin suggested 11 January 1996 as a first choice, and 09 January 1996 as a second choice. o J. Dolegowski/CH2M HILL recommended that DON send a letter to the agencies immediately to request a resolution to issues that will affect the evaluation of a new remedial approach in the Principal Aquifer. o A. Piszkin stated that CH2M HILL, in response to the agency comments, will simulate Alternative 2a without the two proposed DON wells in the Principal Aquifer. o B. Arthur and J. Jimenez said that the agencies recognize that recommended changes will require revision of the Federal Facilities Agreement schedule for the IAFS, Proposed Plan, and ROD. B. Arthur suggested that the agencies have only a 30-day review instead of a 60-day review of the next version of the IAFS. J. Dolegowski stated that revision of the Draft IAFS was to begin immediately following receipt of agency comments. Because of the agency/DON consensus to hold off on revising the IAFS until additional decisions are made, the FFA schedule is currently being delayed on a day-by-day basis. o A. Piszkin stated that DON will need to assess the options, including funding, to decide how best to incorporate these recommended changes to the IAFS after DON and the agencies have resolved the policy and technical issues.

**Attachment 1
List of Participants**

Present at CH2M HILL offices in Santa Ana, California:

Andy Piszkin/Code 1831.AP
Bonnie Arthur/EPA
Juan Jimenez/DTSC
John Dolegowski/CH2M HILL
Hooshang Nezafati/CH2M HILL
John Lovenburg/CH2M HILL

Participating by telephone:

Lawrence Vitale/RWQCB
Sherrill Beard/DTSC
Roy Yeaman/DTSC
Davi Richards/CH2M HILL