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Southwest Division

1220 Pacific Highway, Building 128

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FROM:

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MEETING MINUTES

Meeting Subject: Phase II RI/FS Work Plan and Field Sampling Plan - MCAS El Toro	Meeting Date April 24, 1995 Meeting Time 1000. Meeting Place BNI San Diego Meeting Notes Prepared By Patrick Brooks	
Attendees: (*Part Time)		
<u>Navy</u> Jason Ashman *Ginny Garelick *Andy Piszkin	<u>Bechtel</u> Patrick Brooks David Cowser *Irene Findikaki Tim Latas Katrina Lyons *John Scholfield Dante Tedaldi Stacie Wissler	<u>Other</u> Bonnie Arthur - U.S. EPA Sherrill Beard - Cal EPA Juan Jimenez - Cal EPA *Joseph Joyce - MCAS El Toro *Vish Parpiani - MCAS El Toro Larry Vitale - CRWQCB
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MEETING MINUTES (continued)

Summary of Meeting Discussion Topic(s)/Action Items :

The meeting began with Jason Ashman announcing that the Navy's contract with a facilitator had not been finalized and he would be acting as facilitator for the April 24 and 25 meetings if there were no objections. No one objected. After the agenda review, Juan Jimenez and Bonnie Arthur asked that a conference call be scheduled with the toxicologists and risk assessors to discuss the use of PRGs vs. RBCs. Jason recorded the request as Action Item No. 1. Action Items are listed at the end of the meeting minutes.

Jason stated that the focus of the April 24 meeting was a general discussion on the Phase II RI/FS Work Plan and Field Sampling Plan for OU-2 and OU-3. He reminded the group that the Project Vision is to maximize reuse of MCAS El Toro by 1999, and the Project Mission is to maximize remediation and reuse while protecting human health and the environment. Joseph Joyce told the group that Orange County has been recognized as the regulatory authority responsible for reuse planning.

Jason said his expectation of today's meeting was to provide a quorum for questions and answers that would lead to better understanding of the work that is needed to further the Project Vision and Mission. Larry Vitale said that the question and answer session was an opportunity to reduce the number of agency comments that would have to be addressed by the contractor. Joseph Joyce agreed. Sherrill Beard added that the meeting should make it easier for the contractor to respond to the agency comments.

Ginny Garelick stated that the more complicated issues would be recorded in the issues bin to save time for discussion. Items placed in the Issues Bin are recorded at the end of the meeting minutes.

Andy Pizkin asked if there is a way to issue an addendum to the Work Plan and Field Sampling Plan to minimize repeated work. This became Action Item No. 2.

The dates at which time agency comments are due for the various plans were summarized. The due dates and associated plans are recorded in Action Item No. 3.

The question and answer session began with a description of the Work Plan and Field Sampling Plan organization by Tim Latas. Bonnie Arthur said she was very satisfied with both the organization and flow charts. Larry Vitale said the overall organization was fine. Juan Jimenez said the Plans were well organized and that it was easy to find what he was looking for, but reminded the group that the Plans did not address ecological risks in enough detail.

Sherrill Beard said the BCT needs to recognize that field meetings will be very important because of the flexible nature of the Work Plan. Dante Tedaldi agreed saying that the decision to progress from Tier 1 to Tier 2 was a decision to be made with the BCT. Bonnie said that a discussion of the BCT's involvement in the decision-making process could use a more complete discussion in the general section of the Work Plan.

Tim Latas asked what kinds of information should be presented and how much review time would the BCT require. Bonnie Arthur responded that a one-page form faxed to the agencies had been used successfully in the past. She said that a weekly and monthly field work schedule would help her plan her schedule. If the contractor did not receive an agency reply in three days, the contractor could assume a positive response to the request. It was acknowledged that the contractor was responsible for making sure the project managers at the agencies had received their faxes. Larry Vitale reminded the U.S. EPA and Cal EPA that agency communication would be necessary if this policy was adopted.

MEETING MINUTES (continued)

Jason Ashman asked Bonnie how soon she could provide an example of the form. She stated that she would not be back at her office until May 3. Obtaining an example of the form from Bonnie became Action Item No. 4. Juan said the proposed form should state the decision to be made, discuss the pros and cons of the options, and make a recommendation based on the discussion.

Dante Tedaldi said that the fieldwork decision process for El Toro would be equivalent to the one used at Tustin. Action Item No. 5 is to provide a description of this process.

Andy Piszkin offered that the form could include an issue and a recommended specialist. Providing a secondary contact list became Action Item No. 6. Everyone agreed that this process should improve efficiency and it should not be used if it proves cumbersome.

Dante noted that the flowchart for beginning field work at OU-3 was not consistent with the Work Plan text. David Cowser reminded the group that the schedule was based on work awarded by the Navy and did not necessarily match work proposed in the Work Plan. He said a new schedule would be developed based on the approved Work Plan. Jason discussed the funding status of OU-3 and the Alton Parkway Extension; they have been funded but are on hold while the Navy investigates how much funding is available for other projects. He said questions should be directed to Dana Sakamodo.

Bonnie Arthur said she had a hard time understanding the decision process to install monitoring wells at Site 2. Juan Jimenez said that the use of the word "phase" was confusing when describing Tier 1 and Tier 2 activities. Katrina Lyons responded by saying that we know additional downgradient wells need to be installed, but the upgradient and cross gradient wells are dependent on the results of Site 2 well sampling. She added that confusing terminology would be eliminated from the Final Draft Work Plan. Bonnie also noted that chemical lists in the WP and FSP were different in some cases. Katrina responded that the WP would be edited to match the FSP. Bonnie asked if there was a table comparing groundwater concentrations to MCLs. Pat Brooks responded that MCLs for COPCs are included in Table 4-5 in the Work Plan, and exceedances of MCLs by groundwater samples are discussed individually in the Work Plan appendices.

The group took a break from 1130 to 1150. After returning Jason stated that Andy Piszkin, Ginny Garelick, and Irene Findikaki (Bechtel) would be discussing statistical sampling applications, and estimation of risk outside the room.

A discussion of PRGs vs. RBCs followed. Bonnie reminded that group that the function of the meeting was being fulfilled. Juan is giving the Navy a heads up that agency toxicologists are more comfortable using PRGs; and this may be a change requested in the Final WP.

Dante reminded the group that the agencies have not given an indication if decisions can be made using detection limits that are higher than PRGs/RBCs. Action Item No. 7 is a decision by the BCT regarding detection limits that are higher than PRGs/RBCs. Stacie Wissler said the detection limits for PAHs can be achieved using ion-specific GC-MS analysis for about \$500 per sample. Dante added that background concentrations have been developed for PAHs at Tustin. Comparing PAHs to background or "ambient" concentrations may solve the low detection limit problem. Action Item No. 8 is to provide information to the BCT about ambient/background determination at Tustin. Dante will provide this information.

Sherrill Beard asked if a no further action recommendation would be based on analysis of 10% of immunoassay detects and 5% of non-detects. If so, she had a concern with that. A discussion ensued and it was agreed that analysis of 10% of immunoassay detects and 5% of non-detects was considered a minimum; additional sample analyses would be considered on a case by case basis.

MEETING MINUTES (continued)

Dante suggested that the term "field screening" be clarified, especially as this applies to quantitative and qualitative field analytical methods. He added that confirmation and statistical evaluation of immunoassay results needed more elaboration.

Sherrill asked about QA/QC for the soil gas survey. Stacie responded that the RWQCB procedures would be followed and the RWQCB soil gas protocol is attached as an appendix to the QAPP. Sherrill agreed with the RWQCB procedures.

Bonnie stated that she was pleased with the presentation of employee interviews and aerial photograph interpretation, but was concerned that many of the described features did not appear on the site maps. She also said it was not clear that the presumptive remedy would be used on all of the landfills. Katrina responded that Sites 3 and 5 have existing cover that may fulfill the requirements for landfill capping. Juan stated that a choice should be offered and preferred options recommended. David Cowser said Action Item No. 9 would be to revise WP and explain/support the U.S. EPA presumptive remedy for landfills, groundwater, and VOC-impacted soil.

Juan and Larry agreed that if Sites 3 and 5 meet landfill closure requirements with the existing cap, they should be considered no further action sites not presumptive remedy sites.

Dante noted that analysis for TO-14 was included on Table 4-12 for the VOC Source Area. Pat Brooks stated that this was not correct and would be deleted from the Final WP. Dante also stated that he didn't think VOC analyses were necessary for surface water in the Major Drainages. Pat Brooks said that the Major Drainages were technically part of the VOC Source Area, and VOC analyses were included to evaluate runoff being transmitted to the drainages via the storm drain system. However, if previous analyses of surface water did not contain VOCs, and if there were no objections, VOC analyses could be dropped.

Bonnie stated that "principal threat waste" used in Decision Step 2 needs to be defined. She also asked if GC/MS was available in the mobile laboratories. Stacie said some of the mobile laboratories have that capability.

Dante noted that TRPH analyses were being conducted at some sites and asked why it was being used if the DTSC didn't like the TRPH method. It was determined that TRPH was being used alone only at the Transformer Storage Area. At other sites TRPH analyses were being augmented with 8015 analyses. Everyone agreed that this was acceptable.

A discussion ensued comparing the virtues of EPA 8310, 8270, and the ion-specific 8270. Juan agreed to work on Action Item No. 9, determination of whether EPA 8310 or 8270 is to be used at EL Toro.

Katrina Lyons began with a presentation of Site 2, the Magazine Road Landfill. Unit 1 - the investigation of the landfill will begin by evaluating the limits of waste disposal. This is needed for future deed restrictions, cap design, and placement of borings. Limited trenching will be conducted to confirm the limits of waste disposal. Hot spots will be evaluated using a soil gas investigation. Soil gas samples will be collected on a 100-foot square grid at depths of 15 feet. With this spacing there is an 80% confidence that a hotspot will be identified within a radius of 50 feet. The grid will be reduced when a hot spot is detected. Katrina stated that a soil gas concentration of 300 µg/L was proposed as the level at which the grid be tightened to investigate a hotspot. She said that this concentration was arbitrary, but was in line with work completed by CLEAN I. Juan asked what would be done if all the soil gas readings exceeded 300 µg/L. Pat Brooks reminded the group that the highest TCE concentrations in groundwater beneath the landfill ranged from about 60 to 80 µg/L, and that the probability of exceeding 300 µg/L in every soil gas

MEETING MINUTES (continued)

sample was very small. Dante questioned what composed the 300 µg/L - methane and VOCs? It was agreed that the action level for which to further investigate landfill hotspots should be total VOCs.

Bonnie noted that the monitoring well figure for Site 2 does not identify well 02_DGMW59. Juan included that Figure B-5 was also very hard to read. He liked the flowcharts used for OU-3 sites, and that the option for no further action should be more apparent.

Dante told the group that during a visit to Site 2 he noted ponded water on the landfill surface and that there seemed to be a leaking water main present. Juan said there may be two water mains that cross Site 2. Dante said that the water mains may affect the presumptive remedy. The mains should be identified on a map, and the potential for dealing with maintenance on the mains should be addressed. Action Item No. 11 is for Katrina to find out about the water mains by contacting Barbara Wilson at MCAS El Toro. Juan asked how the fault that crosses Site 2 will be dealt with. Katrina responded that the proposed network will provide adequate groundwater monitoring on both sides of the fault.

Katrina said that vadose sampling at Site 2 will not be conducted because it is a known leaker. Hot spot characterization will be extended to include Borrego Canyon Wash recognizing that vegetation and topography may dictate modifications to the 100-foot square grid. Surface water and sediment samples will be collected. Juan reminded Katrina to delete the word "adequate" from the sentence "surface water samples will be collected when there is adequate streamflow." She agreed, saying that surface water samples would be collected when streamflow is present.

Katrina said there would be an opportunity to have a meeting with the BCT after the Site 2 wells had been sampled and before hydropunching was initiated. Sherrill asked how the hydropunch samples would be located. It was agreed that the methodology for locating the edge of the groundwater plume would be decided on a case-by-case basis.

Dante said it was confusing that the Tier 2 sample locations were shown on landfill figures but not in the rest of the document. Katrina said she would clear this up by explaining Tier 2 locations in the WP text and labeling the Tier 2 sample locations on the figures.

Sherrill asked that the maximum concentrations of COPCs be identified by location and sample number.

Juan pointed out that the third bullet on page B-36 should read groundwater has been impacted by the landfill, and on line 4, 2nd paragraph below bullets, modify statement to read "if groundwater has been impacted in those directions." The first sentence on page B-37 should be restated to communicate that uncertainty was created when TCE was detected in the first round of sampling but not the second. Page B-38, 4th bullet out of place. The introduction to the bulleted statements says "will be," bullet 4 says "may be." The first bullet indicates Map B-3, but it should read Map B-6. It was decided that those sites being considered for EE/CAs should be left out of the final WP.

Bonnie noted that the problem statement for Site 3 includes only VOCs. Other COPCs should be considered. Katrina agreed. Bonnie also said that she would like to see locations of trenches and other features included on the landfill figures that were described from aerial photograph review and from employee interviews. Katrina responded that including those features on the landfill figures implied a level of certainty about their location that we don't have. Sherrill agreed that because we are using such a large grid that it is necessary to plot the features. Bonnie then added that as long as the features are included within the landfill boundary, they need not be plotted on the landfill figures. Sherrill agreed. Bonnie asked that Katrina strike the statement "no additional wells are proposed" on page C-41.

MEETING MINUTES (continued)

Juan noted that the description of landfill sites do not match the bullets on page B-21. Katrina said that this would be modified.

A meeting evaluation form was filled out by the group and the meeting ended at about 1700.

MEETING MINUTES (continued)

Item No.	Action Items	Responsible Individual	Due Date/ Status
1.	Set up conference call or meeting to discuss the use of PRGs vs. RBCs. Individuals to be included are: JP, JC, DL, GC, BA, JJ, Jo Jo, JA, DT, TL, and SB.	Juan Jimenez	TBD
2.	Option of issuing an addendum to Work Plan and Field Sampling Plan instead of issuing Final Draft.	Jason Ashman	TBD
3.	May 5 - comments due on QAPP May 22 - comments due on Work Plan June 5 - comments due on Field Sampling Plan	U.S. EPA Cal EPA RWQCB	see comment
4.	Provide fieldwork info/decision form	Bonnie Arthur	May 5
5.	Describe field work decision process	Bechtel	May 5
6.	Provide contact list for each office to Jason.	All	May 5
7.	Decision from BCT regarding detection limits that are greater than PRGs/RBCs.	BCT	May 5

MEETING MINUTES (continued)

8.	Provide information of the process of ambient/background concentration determination to BCT.	Dante Tedaldi	May 5
9.	Revise Work Plan to explain/support presumptive remedy.	Bechtel	May 12
10.	Decide which analysis (8310 vs. 8270) is most appropriate to analyze PAHs at EL Toro	Juan Jimenez	May 5
11.	Contact Barbara Wilson at MCAS El Toro and identify/describe water mains that cross Site 2	Katrina Lyons	May 5
12.	Memorialize BCT decision to omit existing EE/CA sites from next edition of WP and that no comments will be submitted.	Joseph Joyce	May 5

Issues Bin:

1. Provide more information of ecological risk in Work Plan.
2. Develop process to include BCT in field work decisions.
3. On the proposed fieldwork decision form list all options, a short discussion of each, and the recommended option.
4. Provide advance distribution of field work schedules.
5. Clear up the use of the word "phase" in the WP; it is confusing.
6. DTSC prefers PRGs to RBCs. Why are we using RBCs?
7. What is the quantity of samples/analyses required to make a decision for no further action?
8. Presumptive remedy for landfills is not a given.
9. What is the decision process for sampling channels, washes, and streams?
10. Page 4-5 "define principal threat waste."
11. Clarify analytical method decision process.
12. SWDIV chemist Nars can be reached at 619-532-1149.
13. David Liu available on 4-26 and 5-8; not 4-27 through 5-5.
14. Landfill trenching to confirm waste disposal boundaries.

MEETING MINUTES (continued)

15. Specify how hot spots would be removed.
16. Explain grid tightening criteria of 300 µg/L.
17. Discuss high levels of pesticide in 02_UGMW25 soil sample.
18. Discuss the fault that crosses Site 2 more thoroughly.
19. Clarify figures to indicate Tier 2 proposed actions.
20. Include locations of in list of COPC highest concentrations.
21. Description and bullets do not match on page B-21.
22. For OU-3 sites, early action and long-term action differ only with pilot tests. Are there other criteria?