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CLEANUP Program 20
Bechtel Job 22214
Contract No. N68711-92-D-4670
File Code: 0208

IN REPLY REFERENCE: CTO-059/0071

8 March 1995

Mr. Andy Piszkin
Lead Remedial Project Manager
SOUTHWESTNAVFACENCOM, Code 1831.AP
1220 Pacific Highway
San Diego, CA 92132-5187

Subject: Meeting Minutes for February 1995
Meeting Subject: Review of Draft Health and Ecological Risk Assessment Work
Plan, CTO-059, MCAS El Toro

Dear Mr. Piszkin:

Attached are the Meeting Minutes for 21 February 1995 for CTO-059, MCAS El Toro. The minutes were prepared under Contract N68711-92-D-4670. If further information is required, please contact me at (619) 687-8802.

Sincerely,



David K. Cowser
Project Manager

DKC:cjg

Attachments: CTO-059, MCAS El Toro Minutes for February





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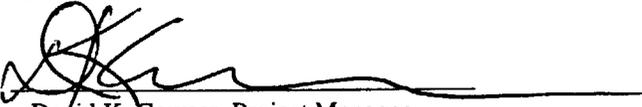
CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

CONTRACT: No. N-68711-92-D-4670

DOCUMENT CONTROL NO.: CTO-0059/ 0071

TO: Jason Ashman, RPM
SOUTHWESTNAVFACENGCOM, Code 1831.JA
1220 Pacific Highway
San Diego, CA. 92132-5187

DATE: 8 March 1995

FROM: 
David K. Cowser, Project Manager

DESCRIPTION: Meeting Minutes for February 1995, CTO-0059, MCAS El Toro
Meeting Subject: Review of Draft Health and Ecological Risk Assessment Work Plan

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

CATEGORY: Preliminary Draft Preliminary Final Draft Final

SCHEDULED DELIVERY DATE: None ACTUAL DELIVERY DATE: 3-8-95

NUMBER OF COPIES SUBMITTED: 1

COPIES TO: A. Piszkin, Code 1831.AP
D. Cowser, PM - BNI
D. Tedald - BNI
D. Liu - BNI
B. Arthur - USEPA
J. Paull - USEPA
J. Christopher - CalEPA
J. Jimenez - CalEPA
R. Blanchet - Kleinfelder

L. Miesner - CH2MHILL
J. Joyce - MCAS El Toro
B. Kown - BNI
J. Kluesener - BNI
T. Latas - Kleinfelder



MEETING MINUTES

Meeting Subject: Review of Draft Health and Ecological Risk Assessment Work Plan, CTO-059, MCAS El Toro		Meeting Date: 21 February 1995	
		Meeting Time: 0900	
		Meeting Place: Bechtel National Office, 45 Fremont Street, San Francisco, CA	
		Meeting Notes Prepared By: David Liu	
Attendees: (*Part Time)			
<u>Navy</u>	<u>Bechtel</u>	<u>Other</u>	
Andy Piszkin	David Cowser	Bonnie Arthur - USEPA	
Jason Ashman	David Liu	Jeff Paull - USEPA	
	Dante Tedaldi	John Christopher - USEPA	
		Juan Jimenez - USEPA	
		Richard Blanchet - Kleinfelder	
		Liz Miesner - CH2MHill	
		Joseph Joyce - MCAS El Toro	
Additional Distribution (In Addition to Attendees):			
John Kluesner - BNI			
Bong Kown - BNI			
Tim Latas - Kleinfelder			

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

The purpose of the meeting was to discuss the comments submitted by U. S. EPA Region IX and Cal/EPA on the draft health and ecological risk assessment work plan dated November 4, 1994 and settle issues. Ashman began the meeting at 10 AM when all invited individuals arrived with a brief discussion of the vision and mission for the project. The vision is to maximize the reuse of MCAS El Toro by 1999, and the mission is a fast-track remediation of MCAS El Toro to expedite the reuse and protection of human health and the environment.

Topic: Human Health Risk Assessment Work Plan

1. Role of the RBCs developed during the Phase I investigation by CH2MHill ("Hill").

The conventional procedure is described in the RAGS. Liu stated that during the preparation of the work plan, Bechtel decided that the conventional procedure would be faster and more economical than updating the RBCs and calculating a set of RBCs based on Cal/EPA cancer slope factors, a task not performed by Hill.

Believing that the RBCs would be used as a risk screening tool, Paull (EPA) strongly recommended that Region IX's PRGs be used instead because the procedures used to develop them have been reviewed and approved by Region IX and Cal/EPA. Use of the RBCs for screening would cause a delay in approving the results because the procedures used to develop the RBCs would have to be thoroughly evaluated by the agencies. Miesner (CH2MHill) stated that the PRGs in existence at the time the risk assessment was initiated two years ago were questionable and that the Navy, Region IX, and Cal/EPA agreed that developing RBCs to assist with Phase II planning was appropriate.

Miesner also stated that the RBCs and the PRGs in existence prior to August 1994 differed considerable; however, the RBCs and the August 1994 PRGs did not differ significantly.

Liu pointed out that the sites addressed by the work plan have passed the screening stage and that the health risk assessment will produce a new set of RBCs. Those RBCs will be used in the streamlined risk assessments for removal site evaluations and as PRGs for the feasibility studies. If risk screening at other sites is needed, Region IX PRGs would be used. This appeared agreeable to the attendees.

2. Exposure Scenarios, Pathways, and Default Values

Liu stated that (1) the proposed exposure scenarios were residential, industrial/commercial (office worker), and recreational with the recreational scenario including a child and an adult; (2) that Hill's risk assessment used a residential and recreational scenario with the latter limited to a child, and (3) that its scenarios are based on the possibility that MCAS would be redeveloped for residential, industrial/commercial, and recreational use, which are the redevelopment plans for MCAS Tustin. Liu stated that Bechtel feels that the recreational adult should be removed because of the difficulty in defining an appropriate recreational activity. Christopher (Cal/EPA) strongly recommended including an excavation worker engaged in home construction for one year.

3. Background Concentrations for Metals

Christopher stated that while it is not toxicologically appropriate to subtract the background concentration of a chemical from the total concentration when estimating noncancer risk, it is appropriate to do so when estimating cancer risk. He recommended using metal background concentrations developed by Hill and reported in the Phase II DQO document.

4. Tentatively Identified Chemicals (TICs)

Christopher recommended including TICs as COPCs and treating them qualitatively if necessary. He also stated that when the total concentration of the TICs exceeds that of the target analytes, special analytical methods should be applied to confirm the identities and concentrations of the TICs. The site would not be considered well characterized by the agency unless confirmation is made.

5. "Dual Tracking"

Garelick stated that a draft of a new policy regarding use of Cal/EPA cancer potency factors in risk assessments and decision making is being reviewed by the Navy's legal department and that it no longer requires the development of a set of cancer risk estimates based exclusively on U.S. EPA cancer potency factors and another set based on Cal/EPA cancer potency factors with U.S. EPA cancer potency factors used in the absence of Cal/EPA factors. Rather, it requires using Cal/EPA cancer potency factors only with cadmium, hexavalent chromium, nickel, benzo(a)pyrene, chrysene, benzo(kL)fluoranthene, tetrachloroethylene, and 1,2-dibromo-3-chloropropane.

6. Basewide Risk Assessment

Liu asked the agencies to describe what they mean by basewide risk assessment. Christopher stated that Laura Brahce of Kleinfelder performed such an assessment for Sacramento Army Depot and that both he and Dan Stralka of EPA Region IX liked the approach. He recommended that Bechtel obtain a copy of the Kleinfelder report, study the approach, and to arrange for a meeting with EPA, Cal/EPA and SWDIV to discuss using the approach on El Toro.

Topic: Ecological Risk Assessment Work Plan

1. Lack of Detail on Habitat, Potential Receptors, and COPECs

Blanchet (Kleinfelder), author of the ecological section of the work plan, stated that comments submitted by Region IX and DTSC primarily addressed the lack of detail and site specificity in the work plan. In particular, the plan did not identify chemicals of potential concern nor did it identify potential receptors.

He stated that during an October 1994 meeting attended by Roxie Barnett (EPA ecological risk assessment specialist), Tim Latas (CTO lead), David Liu (CLEAN II risk assessment manager for Bechtel), and him, Barnett provided the following instructions:

- A. She would perform the habitat assessment as well as identify organisms that actually use the sites and would pass the information on to Blanchet.
- B. If she did not complete those tasks in time to incorporate the information in the work plan that we should identify the species we plan to study in a technical memorandum after she had completed the tasks.
- C. We should evaluate all of the chemicals found during Phase I and Phase II of the RI, select a practical number of chemicals as chemicals of potential concern, and identify them in a technical memorandum.

Blanchet stated that he contacted Barnett several times to determine if she had performed the survey. Each time, she replied that she hadn't. The last time he asked her was about three weeks ago.

Blanchet also stated that Barbara Wilson informed him that Dames and Moore was preparing a report on species that use the station and would make it available to him. The report was not available at the time the work plan was due.

Arthur (Region IX) said she believes that Roxie completed the habitat and organism survey in October 1994, but does not know where they results are.

At this point, Arthur informed the team that Barnett was leaving EPA to work for Kleinfelder.

Joyce (El Toro) stated that the Dames and Moore report is now available and that Vish Parpriani would send Blanchet a copy if Wilson is away from her office.

Miesner stated that the DQO document may contain the kinds of information needed to complete the ecological risk assessment work plan. Christopher asked if the Navy has approved the DQO document. Someone stated that it is probably still in the draft form.

When asked by Christopher if he could respond to all of the comments if he had a habitat map, the DQO document and the Dames and Moore report, Blanchet's answer was positive based on the assumption that the two documents contained the necessary information. It was agreed that the Dames and Moore report and the DQO document be made available to Blanchet for use in revising the ecological portion of the plan.

2. **Body Burden and Hazard Index Approaches**

Christopher stated that the relationship between body burden and toxicity is poorly understood and that a better indicator of hazard is the ratio of the estimated dose and safe dose (i.e., the hazard index). Blanchet agreed.

3. **Bioassays**

Christopher stated that there are only two reasons why bioassays might be performed:

- 1. Available data indicate that toxic levels of chemicals are present and confirmation is needed.
- 2. Available data indicate that toxic levels of chemicals are not present, but the data base is too weak to comfortably draw such a conclusion.

Leadon (SWDIV) stated that bioassay should not be performed unless absolutely necessary. Christopher, Blanchet, and Liu all agreed.

4. Cleanup Impacts

Leadon suggested inclusion of an assessment of the ecological impact of cleanup, citing as an example, the San Pedro sites where soil removal could have an adverse impact on endangered species. There was no discussion of this matter.

Miscellaneous Topics

1. Separate Health and Ecological Work Plans

Christopher suggested that the human health and the ecological portion of the risk assessment work plan be submitted as separate documents. He reasoned that since the human health section needs only minor revisions, it would be appropriate to have it approved first.

Arthur stated that separate submissions may affect deadlines for the RI report.

No group decision was made on Christopher's recommendation.

Item No.	Action Items	Responsible Individual	Due Date/ Status
1.	Revise table of dose equation parameter values and send it to EPA and Cal/EPA for review with a copy to G. Garelick, SWDIV.	D. Liu	3-1-95
2.	Include a conceptual exposure model in the health risk assessment work plan.	D. Liu	Unspecified
3.	Include a list of chemicals of potential concern in the work plan and base the list on Phase I data.	D. Liu	Unspecified
4.	Modify, bullet four of Section 4.4.1 of the Work Plan, which reads, "compare measured chemical concentrations with health and ecologically based standards or criteria or with RBCs when standards or criteria are unavailable" to read: "quantify risk at observed concentrations".	D. Liu	Unspecified
5.	Identify in the work plan the RI/FS sites and the early removal action sites.	D. Liu	Unspecified
6.	Obtain copy of report on Sacramento Army Depot from Kleinfelder as soon as possible and arrange for meeting with agencies and SWDIV to discuss and agree on an approach to conducting a basewide risk assessment.	R. Blanchet	ASAP
7.	Obtain copies of the Dames and Moore report, the Phase I DQO document, and other documents needed to enhance the site-specific detail of the work plan.	D. Cowser	ASAP
8.	Inform Cowser (Bechtel) of amount of time needed to revise ecological portion of work plan after Blanchet reviews documents referred to in action item 1.	Blanchet	ASAP