M60050.001262 -26 cc: BCT

Bechtel

401 West A Street
Suite 1000
San Diego, CA 92101-7905

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

IN REPLY REFERENCE: 0059/0053

January 26, 1995

M60050.001262
MCAS EL TORO
SSIC # 5090.3

Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway, Room 135
San Diego, CA 92131-5187

Attention: Jason Ashman, RPM

Subject: Transmittal of Meeting Minutes
Site 13 EE/CA Review
January 16, 1995
MCAS El Toro
CTO-0059

Dear Mr. Ashman:

Attached are two copies of the meeting minutes for the Site 13 EE/CA review held on January 16, 1995, for CTO-0059, Phase II RI/FS at MCAS El Toro, El Toro, California, prepared under Contract No. N68711-92-D-4670.

We have submitted copies of this plan to individuals with appropriate number of copies on the attached distribution list.

If you have any questions, please contact Timothy Latas at (619) 541-1145, or me at (415) 768-3286.

Very truly yours,

David Cowser
Project Manager

DC/jbr

cc: Attached list

Attachment: Meeting Minutes for the Site 13 EE/CA Review

BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-92-D-4670 **Document Control No.** CTO-0059/0053

TO: Jason Ashman
Code 1831.JA
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, CA 92132-5187

DATE: 26 Jan 1995
CTO#: 059

FROM: J.W. Kluesener, Operation Manager; D. Cowser, Project Manager

DESCRIPTION: Submittal of Meeting Mintues for the Site 13 EE/CA review at MCAS El Toro, California. This meeting was held on January 16, 1995 at Kleinfelder San Diego office to discuss the preliminary comments from various reviewers of the Site 13 EE/CA.

TYPE: _ Contract Deliverable X CTO Deliverable _ Request for Change/Project Note
CATEGORY: _ Preliminary Draft _ Preliminary Final _ Draft X Final

SCHEDULED DELIVERY DATE: 1-26-95 **ACTUAL DELIVERY DATE:** 1-26-95

NUMBER OF COPIES SUBMITTED: 2

COPIES TO: Bong Kown BNI; Dante Tedaldi BNI; Karnig Ohannessian KA; Jerry Jackson KA; Tim Latas KA

CLEAN II
Interoffice Memorandum

Doc Control No. CTO-0059/0053

To: David Cowser Bechtel

Subject: **Meeting Minutes**
Site 13 EE/CA Review
El Toro MCAS, CTO-059

Date: 16 January 1995

From: Tim Latas

Of: Kleinfelder

Copies to:

Jason Ashman	SWDIV
Bong Kown	Bechtel
Dante Teldaldi	Bechtel
Karnig Ohannessian	Kleinfelder
Jerry Jackson	Kleinfelder

MEETING DATE: 13 January 1995
MEETING TIME: 0930-1230
ATTENDEES: See Attached Sign-In List

The purpose of this meeting was to discuss the preliminary comments of the Base Closure Team (BCT) on the Engineering Evaluation/Cost Analysis (EE/CA) prepared for Site 13 at MCAS El Toro. Mr. Juan Jimenez of the California Environmental Protection Agency (Cal EPA) presented his preliminary comments and also provided a copy of the comments from the California Regional Water Quality Control Board (RWQCB). Dante Tedaldi of Bechtel provided his initial comments which will be reviewed and issued by the BCT. Several topics of discussion were made, including:

- preference of thermal desorption to bioremediation,
- the need of a central treatment system for removal actions, investigation-derived waste, and underground storage tank (UST) remediation,
- the use of total recoverable petroleum hydrocarbon (TRPH) analysis by EPA Method 418.1 rather than total petroleum hydrocarbons (TPH) analysis by modified EPA Method 8015 using a gasoline or diesel standard,
- clarifying the public participation in the EE/CAs and 30-day public comment period,
- who should prepare the Action Memorandum for the EE/CAs,
- comparison of this Navy EE/CA with other EE/CAs in California,
- the 30% contingency for the bioremediation alternative while a 20% contingency was used for the thermal desorption alternatives, and
- cleanup goals for petroleum hydrocarbons.

Mr. Jimenez discussed his comments first. The attendees discussed the selection of thermal desorption of the preferred alternative rather bioremediation. Bioremediation appears to be the preferred treatment method, however, the presence of pesticides and semi-volatile organics preclude the use of bioremediation. A portable thermal desorption may be a feasible alternative because contaminated soils could be excavated from the various sites, stockpiled in a central area, and the thermal desorption mobilized at one time to treat the soils. Bioremediation is an appropriate treatment technology for petroleum hydrocarbon impacted soil but may require more time and is not effective on some semi-volatiles, metals, and pesticides.

Mr. Bong Kown indicated that a central treatment system for soils generated from removal actions, investigation-derived waste, and underground storage tank (UST) remediation may be implemented for MCAS El Toro. The Navy is currently assessing this operation but the central system may be operated by the Remedial Action Contractor (RAC) for the Navy (OHM). Mr. Cowser indicated that the RAC will conduct the removal actions occurring to performance specifications. This specifications for relatively simple removal actions may be included in the Action Memorandum that will follow the EE/CAs. It was also indicated that the RAC (OHM) will probably prepare the Action Memo because the funding will reflect a cleanup action rather than a "study" prepared by CLEAN II. In addition, Mr. Ashman stated that funding may be derived from funds originally designated for the Orange County Desalter project. Because of the financial problems in Orange County, the Navy has requested that the Marine Corps funds for the Desalter be used for groundwater monitoring and removal actions.

Several comments from the reviewers requested additional information on the use of total recoverable petroleum hydrocarbon (TRPH) analysis by EPA Method 418.1 rather than total petroleum hydrocarbons (TPH) analysis by modified EPA Method 8015 using a gasoline or diesel standard. According to the Phase I RI results, Site 13 samples analyzed for TPHg/d contained very low concentrations while TRPH results indicated relatively high concentrations. TRPH are proposed to be used for field screening during the removal work with confirmation samples collected from the bottom of the excavation submitted to off-site laboratory analyses of TPH (gasoline/diesel/oil standards), semi-volatiles organics, metals, and PCBs.

Mr. Jimenez stated that the public participation in the EE/CAs should be amplified. In particular, a 30-day public comment period is required and that an extension can be granted, possibly for 60 to 90 days.

A general discussion of who should prepare the Action Memorandum for the EE/CAs was made. The RAC (OHM) is currently designated as the preparer of the Action Memo because the funds for the RAC indicate cleanup rather than "study". The RAC will be required to follow or exceed what is proposed in the EE/CAs for sampling, analysis, and cleanup.

The CLEAN II team asked Mr. Jimenez how this Navy EE/CA compared with other EE/CAs in California. Mr. Jimenez stated that other EE/CAs were usually less comprehensive. However, the scope of the EE/CA is usually dependent on the "comfort" level of the responsible party rather than being mandated by the Cal EPA. Mr. Jimenez did suggest that the discussion on the different technologies and how they were selected be enhanced. Mr. Tedaldi suggested that a summary table be included to emphasize the selection process on implementibility, cost, and effectiveness.

Mr. Jimenez questioned the reasoning for using the 30% contingency for the bioremediation alternative while a 20% contingency was used for the thermal desorption alternatives. This increase in the contingency was based on the uncertainty of duration of bioremediation.

Larry Vitale of the RWQCB was contacted by telephone to discuss the cleanup level for TPH because these compounds are exempt and not regulates by the Cal EPA. Mr. Vitale stated that 1,000 mg/kg is a reasonable cleanup goal for TPH and a treatment standard should be less than 1,000 mg/kg (100 mg/kg was generally agreed upon as an achievable standard though this should not be stated because different technologies have different

levels of effectiveness). If benzene or semi-volatiles or other non-TPH compounds are present, than the cleanup goals should be evaluated on these compounds.

Comments from the RWQCB were also addressed. These comments indicated that the relation of the RWQCB to Cal EPA should be clarified. The status of three Solid Waste Management Units (SWMU) and an underground storage tank (UST) will be discussed while the relation of cleaning up these sites to Site 13 will be discussed. Also discussed was the cleanup goal for petroleum hydrocarbon (see above). The selection of sampling locations was discussed and the observational method was agreed to as the most appropriate, following the methods typically used for UST removal. Effectiveness of thermal desorption was discussed for petroleum hydrocarbons, especially treatment ranges. Also, the RWQCB requested that a full list of treatment technologies be presented, but not discussed in detail.

Mr. Tedaldi presented his comments that will be submitted to the BCT prior to being incorporated into the formal BCT comments. Many of his comments were similar to the Cal EPA and RWQCB. In particular, these comments suggested the clarification of cost assumptions, detection limits, analytical methods for semi-volatile organics (EPA 8270 or 8310), selection of number of samples, removal of larger particles, cleanup goals based on residential or commercial standards, alternatives considered for treatment technologies, and comparisons of preferred treatment technologies based on effectiveness, implementibility, and costs.

Attendance List

Juan Jimenez	Cal EPA	(310) 590-4919
Jason Ashman	SWDIV	(619) 532-1164
Bong Kown	Bechtel	(619) 687-8745
Dante Tedaldi	Bechtel	(619) 687-8730
David Cowser	Bechtel	(619) 687-8802
Tim Latas	Kleinfelder	(619) 541-1145
Karnig Ohannessian	Kleinfelder	(619) 541-1145
Scott Christopherson	Kleinfelder	(619) 541-1145
Larry Vitale	RWQCB	by telephone