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BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-92-D-4670

Document Control No. CTO-0065/ 0045

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

DATE: 6 April, 1995

FROM: J. Kluesener  
J. Kluesener, Operations Manager

D. Cowser  
D. Cowser, Project Manager

DESCRIPTION: Letter to Jason Ashman Dated 6 April, 1995

Subject: Moving SWMUs to the RAC Contractor

CTO-0065, MCAS El Toro, California

TYPE:  Contract Deliverable  CTO Deliverable  Request for Change/Project Not

CATEGORY:  Preliminary Draft  Preliminary Final  Draft  Final

SCHEDULED DELIVERY DATE: NA ACTUAL DELIVERY DATE: 4/06/95

NUMBER OF COPIES SUBMITTED: Two (2)

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# Bechtel

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San Diego, CA 92101-7905

CLEAN II Program  
Bechtel Job No. 22214  
Contract No. N68711-92-D-4670  
File Code: 0202  
**IN REPLY REFERENCE: CTO-0065/ 0045**  
6 April, 1995

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

Subject: Moving SWMUs to the RAC Contractor; MCAS El Toro, CTO-0065

Reference: Meeting Minutes from the 30 March 1995 MCAS El Toro Site Visit,  
PDCC No. 0065/0044

Dear Jason:

This letter is the follow-up to the Base Closure Team's recommendation that sites be moved to the RAC contractor as quickly as possible. I am proposing for your consideration a procedure to facilitate this plan.

The *RCRA Facility Stabilization Initiative* can be used to move SWMUs 131 and 244 (or any other SWMUs deemed appropriate as a result of RFA activities) to the RAC contractor. The Federal EPA guidance on stabilization initiative identifies three conditions under which stabilization is appropriate. These conditions are: 1) releases that pose actual or imminent threats at levels of concern; 2) releases that, if not addressed in 5 to 10 years will result in further contamination; and, 3) site characteristics amenable to control or abatement techniques that will prevent or minimize the further spread of existing contamination. SWMUs 131 and 244 meet condition one and three given above. Both have reliable existing data documenting contaminants (each has a contaminant above PRGs at a shallow sample location with the other samples showing non-detect). The Final Addendum to the RFA Work Plan and the Addendum to the RFA Final Report can document these conditions and make the recommendation for the SWMU to be handled by the RAC.

When can the RAC begin activities at SWMUs recommended for stabilization? Stabilization initiatives are initiated by the U.S.EPA or authorized States as a part of existing facility requirements, agreements, or orders. **Hence the RAC can commence work with the regulators' approval prior to the issuance of a Final RFA Addendum Report.** The stabilization initiative is considered complete when the RCRA (or CERCLA, as the case may be) process comes to a close. While the stabilization initiative is meant to be a stop-gap measure, it can also serve as the final remedy for a corrective action (or remedial action) if the criteria for closure are met.



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**Bechtel National, Inc.** Systems Engineers—Constructors

Jason Ashman  
6 March 1995  
Page Two

If you have any questions on this matter, please do not hesitate to call me at (619) 687-8803.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacques P. Lord". The signature is fluid and cursive, with a large, stylized initial "J" and a prominent flourish at the end.

Jacques P. Lord  
CTO Lead - 0065

JPL/cjg

cc: Distribution list attached

**CTO-0065 LETTER TO JASON ASHMAN DATED 04/06/95  
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