

JOB 22214 NAVY CLEAN II  
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MCAS EL TORO  
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Comments:

of the remedial actions include: removal of contaminated soil at former UST locations, site characterization activities, in-situ remediation, etc.

*removal actions,*

Prior to initiation of excavation activities, the BCT will need to consider the following waste handling issues:

- o Sampling and analytical protocols for characterization of wastes and for verification of cleanup *are contained in site specific plans, such as the*
- IDW* ✓ o Site-specific parameters and limits to determine if the excavated material is hazardous
- o Disposal facilities to be used for excavated hazardous materials, and disposal protocol
- delete* ~~o Disposal methods and facilities for nonhazardous wastes that may or may not be contaminated with toxic or TSCA materials, such as PCBs or asbestos~~
- o Development of an investigation-derived waste (IDW) plan

Management of contaminated materials will be done in accordance with regulations current at the time of the excavation activities.

## 6.9 PROTOCOLS FOR REMEDIAL DESIGN REVIEWS

Remedial design reviews will be performed in accordance with the QAPP developed for the remedial design effort.

## 6.10 CONCEPTUAL MODELS

### 6.10.1 BRAC Cleanup Team Action Items

No Project Team action items are currently identified for conceptual site models.

### 6.10.2 Rationale

Conceptual site models are used to show relationships between potential sources, exposure pathways, and receptors. Complete exposure pathways include sources, mechanisms of contaminant release, transport media, exposure points, and exposure routes at points of receptor contact.

### 6.10.3 Status/Strategy

Conceptual models for the MCAS El Toro IRP sites were developed as part of the Draft Phase II RI/FS Work Plan based on existing data from the Phase I RI. The conceptual models are provided in Appendix E of this document. The conceptual models may be revised as additional information on the IRP sites becomes available. As appropriate, the conceptual models in Appendix E may be replaced or supplemented.

## 6.11 CLEANUP STANDARDS

*update PRGs*

Preliminary cleanup standards for the IRP sites are currently based on the preliminary risk assessment prepared as part of the Draft Phase II RI/FS Work Plan completed in November 1993.

Groundwater cleanup standards are currently being evaluated as part of the <sup>Interim Remediation</sup> RI/FS for OU-1. Metals concentrations in shallow soils will be compared to background levels for metals (refer to Subsection 6.4).

#### 6.11.1 BRAC Cleanup Team Action Items

- o Establish cleanup standards on a site-by-site basis <sup>in the</sup> ~~site specific feasibility studies.~~
- o ~~Evaluate preliminary cleanup standards prepared during the Phase II RI/FS Work Plan and the FS for OU-1~~

#### 6.11.2 Rationale

- o Cleanup standards will help determine the extent of removal or remediation, and designation of cleanup areas

#### 6.11.3 Status/Strategy

- o Continue to review and evaluate preliminary cleanup standards
- o Evaluate background levels on a site-by-site basis

### 6.12 INITIATIVES FOR ACCELERATING CLEANUP

As an ongoing action item, the BCT will identify and evaluate opportunities for accelerating cleanup throughout the base closure process. Some currently identified methods for acceleration include:

## Chapter 6

## Technical and Other Issues to be Resolved

- o Use of presumptive remedies as appropriate for site remedial action. The BCT will consider using innovative technologies that may accelerate the cleanup process.
- o Fast-tracking of Navy contracting procedures for cleanup activities.
- o Identifying portions of sites that may be appropriate for early remedial action.
- o Use of mobile laboratory for in-field decisionmaking.
- o Field screening.
- o Accelerated analytical turnaround times.
- o Concurrent document review between BCT members.
- o OUs have been subdivided and schedules have been staggered to prioritize remediation at IR sites.
- o Source areas are being investigated for potential early remedial actions.
- o In October 1990, EPA, DTSC, RWQCB, and the Navy signed an FFA to conduct an RI/FS. Details of the FFA are discussed in Subsection 3.1.1 of the BCP.

*By month  
- 1 field*

*meetings during Phase II fieldwork  
→ expedite decision making*

investigations, the BCT will give such sites high priority for early (near-immediate) action.

## 6.16 IDENTIFICATION OF CLEAN PROPERTIES

The environmental condition of properties <sup>were</sup> ~~is being~~ evaluated in CERFA and EBS activities. Draft CERFA and EBS reports are currently being reviewed by the BCT. ~~The~~ <sup>CERFA & EBS</sup> final reports will be submitted to NAVFACENGCOM on 01 April 1995.

*Add  
90% of  
property  
avail for  
reuse?*

Twenty CERFA parcels were identified in the draft CERFA and EBS reports. A confirmation sampling program was conducted for 12 of these parcels. Shallow soil samples were collected and analyzed for pesticides and herbicides. Results of the sampling program will be included in the final CERFA and EBS reports.

### 6.16.1 BRAC Cleanup Team Action Items

The BCT will continue the site characterization per BRAC guidance and identify clean properties at the Station.

### 6.16.2 Rationale

Identification of clean properties is necessary for early disposal of Station property. Results of the confirmation sampling effort will assist in agency concurrence on the CERFA parcels.

### 6.16.3 Status/Strategy

*in time  
final  
sources  
data is  
available*

In the Draft CERFA and EBS Reports, 20 parcels have been identified as uncontaminated under CERFA. Final determinations for clean properties will be made following agency concurrence of the CERFA and EBS documents being prepared for the Station.

## 6.17 OVERLAPPING PHASES OF THE CLEANUP PROCESS

As an ongoing effort, the BCT will attempt to identify phases of the cleanup process that can be overlapped to produce a potential reduction in the time required for completion of the cleanup process. As such, areas of overlap include the following:

- o The RFA was conducted concurrent with the Phase I RI.
- o Treatability studies will be conducted during the early stages of the OU-2 RI.
- o EE/CAs will be conducted simultaneously with the Phase II RI activities. The EE/CAs are discussed in Subsection 3.1 of the BCP.

## 6.18 IMPROVED CONTRACTING PROCEDURES

Environmental restoration at the Station will require the Navy to aggressively issue numerous contracts for investigation and remediation activities. Flexible contracting procedures must be implemented to expedite installation restoration and meet established closure schedules.

- o Limited confirmatory laboratory tests are accepted along with field data
- o Analysis is limited only to site-specific parameters
- o Indicator parameters are accepted for the majority of the routine tests
- o Sample numbers and sample frequencies should not be associated with theoretical and/or statistical calculations without regard to site history, site geotechnology, and history of past operations

#### **6.21 EXPERT INPUT ON CONTAMINATION AND POTENTIAL REMEDIAL ACTIONS**

The BCT and RI/FS team should <sup>continue to</sup> consult experts to provide input on faster investigative techniques and potential remedial actions to meet the aggressive cleanup schedules established for the Station.

#### **6.22 PRESUMPTIVE REMEDIES**

Presumptive remedies are remedies that, based on past evaluations of remedial alternatives at similar sites, can be presumed to be an effective, optimum remedy. Presumptive remedies can expedite the evaluation process that is normally involved in selecting a remedial alternative for a site through the FS process. The BCT will ensure that presumptive remedies are considered for implementation at appropriate sites at the Station.

### *CODE OF ETHICS*

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>o Integrity</li> <li>o Trust</li> <li>o Model the behavior you</li> <li>o Expect from others</li> <li>o Sincere</li> <li>o Empathetic</li> <li>o Value other's opinions</li> <li>o Responsible</li> <li>o Honor diversity</li> </ul> | <ul style="list-style-type: none"> <li>o Honesty</li> <li>o Openness</li> <li>o Dependable</li> <li>o Respectful</li> <li>o Be a good listener</li> <li>o Accountable</li> <li>o Have fun</li> <li>o Credible</li> <li>o Be candid</li> </ul> |
|---|---|

#### **6.24 UPDATING THE EBS AND NATURAL/CULTURAL RESOURCES DOCUMENTATION**

The ~~Draft~~ EBS Report is currently being reviewed by the BCT. The final <sup>حتمی</sup> report ~~will be~~ submitted to NAVFACENGCOM on 01 April 1995.

Natural and cultural resources documentation provided in this BCP will be updated as additional information becomes available.

#### **6.25 IMPLEMENTING THE POLICY FOR ONSITE DECISIONMAKING**

Onsite decisionmaking authority during future field efforts at MCAS El Toro will be an essential part of expediting the investigation and cleanup effort at sites. While field efforts are in progress, the BCT will periodically check that onsite decisionmaking is occurring.

<b>Table 4-1a</b> <b>Relationship Between IRP Sites, OUs, and Parcels</b> <b>MCAS El Toro BCP - March 1995</b>			
Operable Unit	Operable Unit Definition	Parcel	IRP Site
OU-1	Groundwater on- and off-Station that is contaminated with constituents that have migrated from sites at MCAS El Toro	Not Applicable (1)	18
OU-2A	Sites that are believed to be contributing to the VOC plume in groundwater emanating from from the southwest quadrant of MCAS El Toro.	4A/4B/5A	24
		Not Applicable (2)	25
OU-2B	Two landfill sites that require full investigation and will likely have a presumptive remedy applied.	5C	2
		5C	17
OU-2C	Two landfill sites that will undergo further groundwater monitoring to confirm that groundwater is not being impacted.	2A	3
		3B	5
OU-3A <i>OU 3 on 14</i> <i>will be together</i>	Various sites that are not related to the regional VOC contamination in groundwater, and are not scheduled for early action.	2F	1
		5A	6
		5A	7
		4B	8
		5A	9
		5A	10
		4A	11
		4B	12
		1A	14
		1D	15
		5A	16
		5A	19
		1B	20
		4B	21
5A	22		
OU-3B	Sites that are scheduled for early actions.	2A	4
		1A	13

Notes:

- (1) Site 18 is limited to groundwater and, therefore, is not assigned a parcel number.
- (2) Site 25 consists of the Station Washes which border or traverse the Station and, therefore, is not assigned a parcel number.