



BECHTEL NATIONAL INC.

M60050.001754  
MCAS EL TORO  
SSIC # 5090.3

### CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

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

Document Control No.: CTO-0103/0133

File Code: 0208

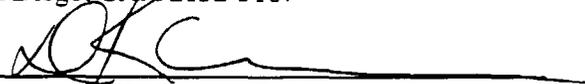
TO: Commanding Officer  
Naval Facilities Engineering Command  
Southwest Division  
Mr. Richard Selby, Code 57CS.RS (O)  
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DATE: 24 January 1997

CTO #: 0103

LOCATION: MCAS El Toro

FROM:

  
D. K. Cowser, Project Manager

DESCRIPTION: Meeting Minutes, DTD 16 January 1997

TYPE:  Contract Deliverable (Cost)  CTO Deliverable (Technical)  Other

VERSION: NA REVISION #: \_\_\_\_\_

ADMIN RECORD: Yes  No  Category  Confidential   
(PM to Identify)

SCHEDULED DELIVERY DATE: 1/24/97 ACTUAL DELIVERY DATE: 1/24/97

NUMBER OF COPIES SUBMITTED: 10/4C/4E

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MEETING MINUTES

<b>Meeting Subject:</b> Inputs for the Final BCP, Based on NAVFAC Review Items for 1997 BCPs		<b>Meeting Date:</b> 16 January 1997
		<b>Meeting Time:</b> 1300
		<b>Meeting Place:</b> SWDIV, San Diego, CA, Bld. 133
		<b>Meeting Notes Prepared By:</b> D. Hallerbach
<b>Attendees:</b>		
<u>Military</u>	<u>Bechtel</u>	<u>Other</u>
Joseph Joyce (MCAS El Toro)	Dimitri Hallerbach	
Andy Piszkin (SWDIV)		
Bernie Lindsey (SWDIV)		
<b>Additional Distribution</b> (In Addition to Attendees):		
D. Cowser (BNI)		
V. Garelick (SWDIV)		

**Vision:** *Maximize restoration and reuse by 1999!!!!*

**Mission:** *Fast-track remediation of MCAS El Toro to expedite reuse and protect human health and environment.*

The purpose of the meeting was to review and satisfy the requirements of the NAVFAC "BRAC Cleanup Plan (BCP) Review Items" for the final El Toro BCP (attached). Resolution of some of these review items also resolve input requests presented in the attachment to the transmittal for the draft BCP (Attachment A), and are indicated on the attachment as "RESOLVED."

Because many of the inputs add information not presently contained in the draft BCP, it is recommended that the BEC share these inputs with the rest of the BCT prior to the submittal of the final BCP on 24 February 1997.

These meeting notes are limited to the resolution of those review items that are not already addressed in the draft BCP, in the judgment of the attendees of the meeting. The organization of these notes follows the NAVFAC Review Item list. Wording from the NAVFAC list is presented in bold-faced type.

**Executive Summary**

- d. **Environmental strategy and schedules tied to reuse and property transfer:** a statement similar to the following will be included in the Executive Summary: Status of Disposal, Reuse, and Interim Lease Process, and in Chapter 2, Section 2.2: "Schedule and prioritization of parcels for reuse, based on the draft final Community Reuse Plan (P&D Consulting Team 1996), will be provided by the LRA in 1997. The BCP will be updated as this information becomes available."
- e. **Environmental Program progress made since last year's BCP (hard data):** the following will be added to the appropriate sections of the BCP (indicated parenthetically):
  - Initiation of 2 time critical removal actions at Sites 2 and 17 and 1 non-time critical removal action at Site 19 (Executive Summary, new section starting on p. ES-3 before Installation Restoration Program, titled, "Environmental Program Highlights"),

## MEETING MINUTES (continued)

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- Agency approval of draft final RI reports for OU-2A, 2B, and 2C, and the approval of the draft OU-2A FS for the vadose zone (p. ES-3, Environmental Program Highlights; and p. 3-6, in the appropriate bullets),
  - Continuing operation of a SVE unit at Tank Farm 2 that has removed 35,000 pounds of petroleum products to date (p. ES-3, Environmental Program Highlights; p. 3-10, 5th paragraph, after the 5th sentence; Table 3-5; Table 3-6; p. 4-5, Section 4.2.1.1, after the first paragraph [along with other UST compliance actions from Table 4-3]; and Table 4-3),
  - Removal of 8,000 gallons (to date) of free petroleum product from the water table at Tank 398 (p. ES-3, Environmental Program Highlights; revise p. 3-10 to indicate 8,000 gallons removed to date),
  - Regulatory closure of 160 USTs to date (150 during 1996 calendar year), including closure of all of Tank Farms 1, 3, and 5 (p. ES-3, Environmental Program Highlights; p. ES-7, Immediate Removal Actions [mention of 3 tank farms]; p. 3-9, first paragraph [mention of 3 tank farms]; Table 3-5, first row [mention of 3 tank farms]),
  - Continuation of GW monitoring, with 2 sampling rounds completed in 1996 (p. ES-3, Environmental Program Highlights; p. 6-7, Section 6.7, first paragraph [inclusion of 1996 progress]),
  - SVE pilot tests at Site 24 that include 22 on-site wells which are effectively removing contamination (p. ES-3, Environmental Program Highlights; p. 3-7, add as 4th bullet to early action status; Table 3-3; p. 4-4, Section 4.1.4, include in 2nd paragraph; Table 4-2),
  - On-site IDW treatment plant that reduces disposal costs and provides irrigation water for the Station (p. ES-3, Environmental Program Highlights),
  - Agency approval of the PAH Reference Study (BNI 1996a) that changed 448 acres of land from area type 7 to area type 3, thus potentially allowing this land to be transferred by deed (if no other LOCs overlie it). ( p. ES-3, Environmental Program Highlights; Figures 3-4 and 3-5), and
  - Continued progress on an agreement between OCWD and MCAS El Toro in support of a multi-purpose project to clean up OU-1 (p. ES-3, Environmental Program Highlights; p. 3-6, first bullet).
- f. **Specifically identify acceleration initiatives that have proven to be successful and payback opportunities for commitment of funding;** the following will be added to the appropriate sections of the BCP (indicated parenthetically):
- Validation of the effectiveness immunoassay field screening kits in the PAH Reference Study (BNI 1996). The use of these kits allowed for quick, accurate analysis of on-site contaminants during RI field activities. (p. ES-9, Validation of Technologies, add after bullets), and
  - Involvement of the regulatory agencies during pre-proposal meetings for new work to gain concurrence from the entire BCT at the earliest possible phases of investigation and cleanup (p. ES-10, Partnering, after the team charter; p. 6-9, Section 6.12, add to bullets).

### Chapter 2

- 2.2 **Relationship to Environmental Programs:** a statement similar to the following will be included in Chapter 2, Section 2.2: "Schedule and prioritization of parcels for reuse, based on the draft final Community Reuse Plan (P&D Consulting Team 1996), will be provided by the LRA in 1997. The BCP will be updated as this information becomes available."

## MEETING MINUTES (continued)

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### Chapter 3

- 3.1 **Discuss at a minimum, top five environmental sites. Site discussion should express the contaminant, the risk, and the cleanup technology of choice, or under consideration.** The top 5 sites are Sites 18, 24, 2, 17, 3, and 5 (OU-1, -2A, -2B, and -2C). Contaminants and risks will be presented as they appear in Table 3-1a, and cleanup technology will be that of the recommended remedial alternative from the appropriate FS. This discussion will appear as 5 bullet items on p. 3-6, after the first paragraph.
- 3.2 **Tie compliance programs to legal drivers and provide dates for must fund FY99/00:** J. Joyce agreed to contact Station staff to obtain this information. The sooner BNI gets this information, the more feasible it will be to include it in the final BCP.
- 3.3 **Natural and Cultural Resources:** BNI was given two reports to include in this section. The reports are listed below along with the information from them that will be used in the BCP:
- JPR Historical Consulting Services. 1996. Historic Context and Proposal for Inventory and Evaluation Work At Marine Corps Air Station (MCAS) El Toro. Draft. Prepared for KEA Environmental. August.  
  
In Section 3.3.5 (p. 3-32), the conclusions of the report will be summarized: A 1996 study (JPR 1996) concluded that there is no basis for concluding that a historic district of W.W.II-era buildings exists; that none of the post-W.W.II buildings are significant in the context of Cold War military developments; and that the possibility exists that four large, unmodified buildings from W.W.II (Buildings 271, 295, 296, and 297) could be significant individually, and should be further evaluated for potential National Register eligibility. Further, the report presents a proposal to accomplish inventory and evaluation efforts for Station buildings.  
  
Figure 3-3c will be modified to include the locations of all 4 buildings.  
  
The reference will be added to Chapter 7.
  - KEA Environmental. 1996. Base Realignment Archeological Survey Report, Marine Corps Air Station, El Toro. Prepared for SWDIV. Naval Facilities Engineering Command. September.  
  
In Section 3.3.4 (p. 3-32) the conclusions of the report will be summarized: A 1996 study (KEA 1996) covered approximately 1,100 acres in, around, and to the south of the natural area. Eight of the ten locations identified in the 1987 report were visited, and one additional location was identified on the central part of the Station near Building 772 and the golf course. Two sites from the 1987 study could not be located. The recent study recommended that no further action be taken at the eight sites that could be located in the natural area because this area will be maintained as a wildlife preserve after the Station closes. The remaining site near the golf course was recommended for further evaluation of its archeological significance.  
  
Figure 3-3c will be modified to include all 11 archeological locations.  
  
The reference will be added to Chapter 7.
- 3.4 **Environmental Condition of Property:** The fuel supply lines (which had been designated as area type 7) will be designated as area type 2, since they have contained only petroleum products, and any releases would consist only of petroleum products.  
  
IRP sites that have removal actions planned (Sites 2, 17, and 19), and sites where other response actions are being taken (Site 24) will be designated as area type 5 instead of 6. This change is considered consistent with area type definitions.  
  
NAVFAC revised the Station acreage in the BCP abstract to 4,855 acres from 4,738 acres, the discrepancy presumably being the El Toro housing units at Tustin. After speaking with the Tustin BCP CTOL (Sharon Reackhof), the acreage of the El Toro housing at Tustin is 164 acres (from

## MEETING MINUTES (continued)

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Tustin's BCP Table 2-1a). Consequently, there are approximately 47 "extra" acres of El Toro land that are not accounted for. If BNI can get the correct information, this off-base property will be included in:

- Section 1.5 (last paragraph);
- Table 1-5 (Property Acquisition Summary);
- Table 1-6 (Off-Base Properties);
- Figure 1-5 (Off-Base Parcels); and
- Chapter 3, Section 3.4.1 (p. 3-34). The text will indicate that the land is not plotted on Figures 3-4 and 3-5.

The acreage of the Tustin land will be included in the total base acreage, and the ECP area type will be designated as area type 1 in:

- Executive Summary: p. ES-2 [in three places, as appropriate]; and p. ES-8;
- Chapter 1: p. 1-4 (as total acreage in 2 places, and as acquired land); and p. 1-9 (as total acreage);
- Chapter 2: pp. 2-1 and 2-4 (as part of area type 1 land, and as land available for transfer on both pages);
- Chapter 3: p. 3-1 (as part of area type 1 land); p. 3-33 (as part of area type 1 land, and as land available for transfer); p. 3-36 (as land available for transfer); Exhibit 3-9; and Table 3-17; and
- Chapter 6: Section 6.16, p. 6-12, first paragraph (as part of area type 1 land)

The land at Tustin will NOT be included in Figures 3-4 or 3-5.

### Chapter 4

1. Pilot testing at Site 24 and 16 will be included in the text (p. 4-4, Section 4.1.4, include in 2nd paragraph, Table 4-2). The purpose of these activities is to evaluate the effectiveness of contaminant mass removal systems.
2. Section 4.1.3, sequence of OU bullets will be modified based on the latest FFA schedule (to be supplied to BNI by SWDIV no later than 30 January 1997).
3. All LOCs that have would not necessarily be evaluated under the IRP or compliance programs that appear in the BCP will be evaluated by the BCT in 1997. A statement similar to, "This LOC will be evaluated by the BCT in 1997," will be included in the appropriate sections of the final BCP. These LOCs include:
  - Aerial photograph anomaly sites and locations identified in personnel interviews (i.e. possible landfill and mercury leaks) (Section 3.1.2.1, second-to-last sentence; Section 3.1.2.2, first bullet and last paragraph; Section 4.1.6);
  - The Desert Storm hazardous waste storage area and 2 pesticide storage areas (Section 3.2.2.3, 5th paragraph; and Section 4.2.2, 4th and 5th paragraphs);
  - 2 PCB storage areas (Section 4.2.4.2, 3rd and 4th bullets); and
  - Former silver recovery unit (Section 3.2.10, 3rd paragraph; 4.2.10, 2nd paragraph).
4. "Possible landfill" identified in personnel interviews near Site 5 (currently plotted on Figures 3-1, 3-4 and 3-5) will NOT be plotted in the final BCP. Review of interview notes and conversation with Tim Latas indicated that the "landfill" was adequately addressed in the RI for Site 5.

## MEETING MINUTES (continued)

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5. Section 4.3 (Natural and Cultural Resources). Information from the 2 sources listed above for Section 3.3 will be incorporated into Sections 4.3.1 and 4.3.2, as appropriate.
6. 40 SWMUs/AOCs were not located during RFA activities. The text (Section 3.2.7, 4th paragraph; and 4.2.7, 1st paragraph) will state, "the Station will attempt to evaluate these SWMUs/AOCs before operational closure." Joseph Joyce will need to suggest this to the Station Environmental Office. Of the 40 SWMUs/AOCs not visited during the RFA, 18 are not plotted on BCP figures.
7. Attached is a listing of LOCs that are not plotted on any BCP figures, including ECP maps ("LOCs Not Plotted in the BCP"). Attachment A includes most of these LOCs, but this list consolidates the information.

### Chapter 5

**Identify reduced design time through the integration of CLEAN and RAC.** Section 5.1, after 2nd paragraph, will include description similar to the following: "Environmental restoration schedules are being effectively reduced through CLEAN/RAC integration. Examples include the current and planned SVE pilot tests at Site 24 (RAC execution with CLEAN technical input), and other planned pilot tests at Site 16."

The second paragraph of Section 5.1 will include the following statement: "Schedule and prioritization of parcels for reuse, based on the draft final Community Reuse Plan (P&D Consulting Team 1996), will be provided by the LRA in 1997, and may effect the IRP schedule. The BCP will be updated as this information becomes available."

Andy Piszkin agreed to review Chapter 5 carefully. Required additional information includes FY96 actual costs and projected costs for the IRP (by site), for compliance programs (mission-related and closure-related costs separate), and for natural and cultural resources. This information will be summarized in Appendix A, Tables A-1 through A-5.

**Address any major execution issues and include a chart of BRAC Projects that are presently underway including Site/POI/AOC, Project description, Estimated Cost, Award Date, and Projected Completion Date.** Such a chart does not currently exist in the BCP. Presumably, this chart would include currently anticipated work for FY97 that has not been awarded. If available, Andy Piszkin could provide this to BNI along with review comments.

### Chapter 6

Various changes were made to the text of Chapter 6. Substantive changes are listed below:

- Section 6.1.1, first and second paragraphs, will be modified to read:  
"Cleanup standards for the IRP sites at MCAS El Toro are determined based on ARARs and the risk assessments prepared as part of the Phase II RIs. Cleanup standards selected depend on such factors as exposure scenarios developed during risk assessment and intended future land use. Standards have included federal MCLs, California MCLs, and U.S. EPA Region IX PRGs for ingestion of groundwater and inhalation of volatiles from household water use. Table 6-1 provides IRP site information on current and anticipated land use for each of the IRP sites. As stated in Tables 6-2 and 6-3, the human-health and surface-water standards appropriate for each IRP site are provided in the respective RI Reports. In general, the human-health standards used during risk assessments for IRP sites to date have been based on the U.S. EPA Risk Assessment Guidance for Superfund (1989 - Part A, and 1991 - Part B).

~~"Groundwater cleanup standards were evaluated as part of the FS for OU 1 and OU 2A. Prior to Phase II RI activities, groundwater analytical results were compared to federal MCLs, California~~

## MEETING MINUTES (continued)

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~~MCLs, and U.S. EPA Region IX PRGs for ingestion of groundwater and inhalation of volatiles from household water use (Jacobs Engineering 1993a)."~~

- Section 6.12, 12th bullet will read: "Investigation of source areas for potential early remedial actions, including SVE pilot tests at Site 24 and the preparation of an interim ROD for OU-1."
- Section 6.16.2: Joseph Joyce stated he would supply an update to this section.
- Section 6.17: delete 3rd bullet; 4th bullet, "CLEAN II CTOs-0073, -0076, and -0079" will be replaced by "VOC source area, landfills, and OU-3 sites"; and a bullet will be added on CLEAN/RAC integration during pilot testing at Site 24, and planned integration during future pilot tests.
- Section 6.19: this section will be updated based on anticipated comments from the LRA.
- Section 6.20: 1st paragraph will be deleted.
- Section 6.24: 1st paragraph will read, "Site specific ~~EBS may be necessary to summarize~~ FOST/FOSL documents will serve as information sources for the summarization of information acquired since the preparation of the basewide EBS. The DON ~~BCT~~ will evaluate the ~~need for~~ site specific EBSs requirements for FOST/FOSL documents on a case by case basis.

## BRAC Cleanup Plan (BCP) Review Items

Consensus Statement, signed by all BCT members

### Executive Summary

Following should be expressed in executive summary:

- a. Is there a Reuse Plan (draft or final/approved)
- b. National Priorities List (NPL) - yes or no
- c. Regulatory program (CERCLA or RCRA), include State agreements or other interagency agreements.
- d. Environmental strategy and schedules tied to reuse and property transfer.
- e. Environmental Program progress made since last year's BCP (hard data).
- f. Specifically identify acceleration initiatives that have proven to be successful and payback opportunities for commitment of funding.

### Chapter 2 Property Disposal and Reuse

#### 2.2 Relationship to Environmental Programs - this section is very important!

Reuse and property transfer are the BRAC Environmental Program drivers. If the connections are not made, program will be more susceptible to cuts. Discussion should include reuse plan, major reuse issues, and how the environmental program is tied to the plan. Include a Reuse Parcel Data Summary Table that includes parcel designation (e.g. Parcel A), acres, priority (e.g. High, Med, Low), parcel description (Camp Arnold), Known Sites, Projected Transfer Date, Transfer Mechanism (e.g. Deed), and Recipient. This is similar to Table 2-1 in a majority of the BCPs.

#### 2.3 Property Transfer Methods - identify what transfer methods are most probable.

### Chapter 3 Program Status

3.1 Restoration - at the beginning of this section, ensure there is a clear indication of major concern sites, and sites that are significant impediments to reuse and property transfer. Tie Installation Restoration programs to legal drivers and provide dates for must fund FY99/00 program. Discuss, at a minimum, top five environmental sites. Site discussion should express the contaminant, the risk, and cleanup technology of choice or under consideration. Include a Site Summary Table that includes all sites. site number, Description, Program (e.g. UST), Other Site Names, Chemicals of Potential Concern, Dates of Operation, Parcel/Operational Unit, Status (e.g. SI), Risk to Human Health and the Environment, NFA (e.g. Yes). This is similar to Table 3-1 in a majority of the BCPs.

3.2 Compliance - (for RCRA sites, same as above) ensure all compliance areas that are applicable to the installation are listed. Tie compliance programs to legal drivers and provide dates for must fund FY99/00. Please note that Defense Site Environmental Restoration Tracking System (DSERTS) eligible sites should be issued under Restoration.

BRAC Cleanup Plan (BCP)  
Review Items (cont'd)

- 3.3 Natural and Cultural Resources - don't ignore this area. this will come back to derail a program when it becomes time to transfer property.
- 3.4 Environmental Condition of Property  
Complete maps and fill in chart. make sure all property available for excess is classified in one of the seven categories. Areas are designated by gross acreage and reported in acres, not percentage. This is a measure of the environmental program.

Chapter 4      Strategy

This chapter is largely discretionary to the BCT's vision. We expect to see evidence of partnering, collective decision making, implementation of acceleration techniques, consideration of innovative technologies where practical. More important are the results or anticipate results of the aforementioned initiatives, which should be shrewd decisions and corresponding cost savings. Describe program reductions/savings as a result of BCT initiatives/decisions. Include discussion of overall program progress including progress made since last year (e.g. number of sites completed, accomplishments vs. goals) and progress planned for the next year. Include any estimates of associated cost and time savings.

Chapter 5      Schedules

Schedules must be coordinated with funding knowledge as you know it. Schedules must reflect priorities identified (reuse, property transfer, legal drivers). Identify completion dates wherever possible. If it is too early to indicate a final program completion date, at a minimum, establish a range of dates that you will target towards and identify critical milestones for accomplishing that date. (Note: All milestones do not have to be within the circle of influence of the BCT.) A Gantt chart tying cleanup actions to parcel reuse and the projected date of reuse is particularly useful for this purpose.

Engineering Field Divisions/Activities must review field division/activity wide executability for contract capacity and incremental funding opportunities.

Identify reduced design time through the integration of CLEAN (study contractor) and RAC (remedial action contractor).

Address any major execution issues and include a chart of BRAC Projects that are presently underway including Site/POI/AOC, Project Description, Estimated Cost, Award Date, and Projected Completion Date.

Show overlapping phases where possible.

BRAC Cleanup Plan (BCP)  
Review Items (cont'd)

Chapter 6      Technical

Address all - some areas we will be taking a close look at:

Groundwater

Cleanup Standards/Levels - Team must address! If there is disagreement, say so, then state a plan to resolve differences. Address whether cleanup levels are driven by reuse and/or regulatory requirements. Major claimants must understand what is the basis for your final decisions.

Interim Remedial Actions

Presumptive (Generic) Remedies

Bias for Cleanup

Appendix A      This is now a part of the NORM submission and will subsequently be extracted from the database.

General Comment - Throughout the BCPs, the program should be conveyed with a bias towards hard, defensible numbers/data points, as opposed to extensive narratives.

Each BCP is the BRAC Cleanup Team's plan. There is significant latitude to allow teams to tailor it to become a productive tool in their BRAC Environmental Program. However, the requirements established in the plans must be in accordance with DoD, EPA, State and Navy program directives and policy. If a plan fails to show a clear link between the policies and how requirements were determined, that BCT will be placing their program in a precarious position with respect to funding.

## ATTACHMENT A

### **Additional Input and/or Verification Required for the 1997 Draft BRAC Cleanup Plan**

This list presents a summary of portions of the draft BCP where information is known to be, or suspected of being, outdated, or inaccurate.

When submitting revised information, please include the section or table number corresponding to the portion of the text being revised.

#### **Executive Summary**

Most of the information contained in the Executive Summary comes from the text of the BCP. As information in the body of the BCP is revised, the Executive Summary will be revised accordingly.

1. Initiatives for Accelerating Cleanup: careful review by the BCT is recommended.  
**RESOLVED**
2. Summary of Current BCP Action Items/Table ES-1 (BCT/Project Team Action Items)
  - a. UST section may require update through early February, 1997.
  - b. PCB section requires update.
  - c. All other sections may require update.

#### **Chapter 1**

1. Table 1-1 (Current BCT Project Team Members): review for accuracy is recommended.
2. Table 1-3 (Hazardous Waste Generating Activities): Revisions were received for preliminary draft, but the time period over which wastes were generated is required (i.e. which 2-month period does the list cover?).
3. Table 1-6 (Property Acquisition Summary): Total acreage is 4,738, while the total acreage calculated from current GIS information is 4,722 acres. BNI has been unable to resolve this inconsistency.

#### **Chapter 2**

1. Section 2.1 (Status of Disposal Planning Process)
  - a. Did the Orange County Board of Supervisors submit the draft final CRP to ASN and HUD by 15 December 1996?
  - b. Was the Bake Parkway project completed in 1996?
2. Table 2-1a (Community Reuse Plan Parcel Reuse Data Summary): Clarification is required regarding the definition/meaning of "Aviation Related Costs."

**Chapter 3**

1. Table 3-1a (Site Summary) General Comments:
  - a. The portion of Table 3-1a which includes PCB Transformers has not been updated, neither has Table 3-10, PCB transformer Inventory. BNI will use the results of the recently completed Station Transformer survey and sampling to update totals and status as soon as this information becomes available.
  - b. The "Regulatory Mechanism" column for all USTs and OWSs has been filled in. For tanks that are not yet closed, "O/R" was assigned, indicating that the appropriate agency (either OCHCA or RWQCB) has not yet been determined.
  - c. The "Regulatory Mechanism" column for all RFA sites (SWMUs/AOCs and TAAs) has been filled in. All were assigned "RCRA."
  - d. Risk values for human health have been entered in Table 3-1a for those IRP sites that have completed RI Reports. No other risk values or comments have been entered in this table. Input required concerning "risk" for all other LOCs, since many have not had a formal risk analysis performed, or tanks have been closed.
  - e. The following thirteen Solid Waste Management Units/Areas of Concern (SWMUs/AOCs) have been included in Table 3-1a and Table 3-13, but are not plotted on BCP figures (including ECP maps): SWMU/AOC 32, 35, 50, 55, 56, 69, 89, 96, 103, 121, 170, 237 and 238. Location information is required.
  - f. Location information is required for TAA 443 (Less-Than 90-Day Accumulation Area). Site is currently not plotted on BCP figures (including ECP maps).
  - g. Information regarding which sites are not plotted on BCP figures has not been updated for this draft, or included in Table 3-1a. Information will be incorporated for the final BCP submittal in March 1997.
2. Section 3.1.2.1 and Table 3-1b Aerial Photograph Features/Anomalies: Update on whether or not these features/anomalies have been investigated or evaluated is required.  
**RESOLVED**
3. Section 3.1.2.2 Features of Potential Environmental Concern Identified in Personnel Interviews: The text states that further evaluation of these areas is needed. Has any action been taken to date?  
**RESOLVED**
4. Table 3-3 Early Action Status: Update on the status of IRP Sites 2, 17 and 19 (Unit 2) may be required. The table should be reviewed, and additional actions added, as appropriate.  
**RESOLVED**
5. Table 3-4 Mission/Operation-Related Compliance Project: The table should be reviewed, and additional actions added, as appropriate.
6. Table 3-5 Closure Related Compliance Project: The table should be reviewed, and additional actions added, as appropriate.  
**RESOLVED**

7. Table 3-6 Compliance Early Action Status: The table should be reviewed, and additional actions added, as appropriate.  
**RESOLVED**
8. Section 3.2.1.1 Underground Storage Tanks
  - a. The following five USTs are not plotted on BCP figures (including ECP maps): USTs 55A, 55B, 252, 493 and 724A. This location information is required.
  - b. Update on the status of UST monitoring systems installation is required.
  - c. The status of individual USTs (i.e. active, inactive, etc.) has been updated in Table 3-7, however, this change has not yet been made to the UST figures in the BCP (Figures 3-2b, c, d and e). This update will be made for the Final BCP report in March 1997.
9. Section 3.2.1.2 Aboveground Storage Tanks
  - a. Of the currently listed ASTs, AST 610B is not plotted on BCP figures (including ECP maps). This location information is required.
  - b. Have AST storage statements for ASTs at MCAS El Toro been filed with the RWQCB (in Santa Ana) yet?
10. Section 3.2.2 Hazardous Materials/Waste Management
  - a. Additional information on accumulation areas (more recent than October 1996) may be required.
  - b. Location information is required for TAA 443 (Less-Than 90-Day Accumulation Area). Site is currently not plotted on BCP figures (including ECP maps).
  - c. Table 3-9 (Less Than 90-Day Accumulation Areas): The accumulation area near Bldg. 137 (which has been previously listed in Table 3-9 of the March 1996 BCP and preliminary draft BCP 1996), did not have a database tracking number assigned to it, nor did it have any identifying information in the comments column. This location was assumed to coincide with SWMU/AOC 43, which was listed in Table 3-13 (SWMUs/AOCs), and also did not have a database tracking number assigned to it, nor was it located during RFA activities. SWMU/AOC 43 was then given a database tracking number of "RFA 43" in Table 3-13 and is assumed to coincide with Table 3-9's limited information about an area near building 137. Reference to an unidentified accumulation area near Bldg. 137 has been deleted from Table 3-9.
  - d. The term "Less Than 90-Day Accumulation Area" was not used in the final Addendum to the RFA report (BNI 1996). The terms "HWSA" (Hazardous Waste Storage Area) and "Drum Storage Area" were used instead. Which term is preferred for temporary storage areas? The resolution to this may affect which sites (RFA and TAA sites) are/are not included in Table 3-9 (Less Than 90 Day Accumulation Areas) and Table 3-13 (SWMUs/AOCs).
11. Section 3.2.4.1 PCB Transformers: A Station-wide survey and sampling effort of all Transformers was completed in 1996. This section has not been updated with recent results. As soon as information becomes available, it will be incorporated into the BCP.

12. Section 3.2.4.2 PCB Transformers And Equipment Storage Areas

- a. Update information on PCB transformer and equipment storage area and any relevant field sampling results.
- b. Last paragraph of section: update is required on the status of 2 PCB release locations mentioned.

**RESOLVED**

13. Section 3.2.7 RCRA Facilities (SWMUs)

- a. The following thirteen Solid Waste Management Units/Areas of Concern (SWMUs/AOCs) have been included in Table 3-1a and Table 3-13, but are not plotted on BCP figures (including ECP maps): SWMU/AOC 32, 35, 50, 55, 56, 69, 89, 96, 103, 121, 170, 237 and 238. Location information is required.
- b. Numerous SWMUs/AOCs have been recommended for further action by the RAC contractor ("Transfer to RAC" in Table 3-13). What is the status on these actions?
- c. Numerous SWMUs/AOCs that were not sampled during the RFA have been recommended for NFA in the EBS and in previous BCPs. Is there DTSC concurrence on this? The summary table in the final RFA report by Jacobs (Table 6-15) only listed those SWMUs/AOCs that were sampled.

**RESOLVED**

- d. The text of this section (3.2.7) has been re-written/updated since the November 1996 preliminary draft, to reflect the changes made to Table 3-13, and more fully incorporating the results and recommendations from the final Addendum to the RFA (BNI 1996).

14. Section 3.2.8 NPDES Permits: updated information may be required.

15. Section 3.2.9 Oil/Water Separators: The following OWSs are included in Table 3-14 but are not plotted on BCP figures (including ECP maps): OWS 392, 652, and 851. This location information is required.

16. Section 3.2.10 Silver Recovery Units: updated information may be required.

**RESOLVED**

17. Section 3.2.12 Air

- a. 2nd paragraph: Need update on exact total of Air permits that have been approved and incorporated into the RECLAIM permit.
- b. last paragraph: BCP text currently states, "Assembly Bill (AB) 531... states that... The state will establish a statewide registration program by 01 January 1997." Update required on the latest status of this new statewide registration program, as well as the status of air permitting at MCAS El Toro.

18. Section 3.3.1 Ecological Resources

- a. Table 3-15 (Vegetative Cover and Other Features in Natural Area), and Table 3-16 (Special Status Wildlife Species at MCAS El Toro): information for update to these

tables will be available from the upcoming EIS report and will be incorporated next year.

- b. Figure 3-3a (Vegetative Cover in Natural Areas), Figure 3-3b (Wetlands and Water in Natural Area), and Figure 3-3c (Natural and Cultural Resources Features): information for update to these figures will be available from the upcoming EIS report and will be incorporated next year.
19. Section 3.3.2 Wetlands and Waters: updated information for update to this section will be available from the upcoming EIS report and will be incorporated next year.
20. Section 3.3.4 Archaeological Resources: updated information from after 1978 may be required.

**RESOLVED**

21. Section 3.4 Environmental Condition of Property

- a. Exhibit 3-9 and Table 3-17 (Land Areas by ECP Area Type), figures and text in this draft have been updated since the preliminary draft.
- b. Current acreage totals of land for each area type have been calculated for this draft of the BCP. Area types have been designated for all Station LOCs for the draft BCP based on the new ECP area type definitions (DoD guidance, 1996).
- c. All IRP sites are currently assigned ECP Area Type "6." According to the ECP area type definitions, IRP Sites 2, 17 and 24 could possibly be assigned Area Type "5." Recommendation for this possible change in ECP classification is requested.  
**RESOLVED**
- d. Currently, fuel supply lines are classified as Area Type "7." According to the new ECP area type definitions (DoD guidance, 1996), these lines only contain (and could possibly release) petroleum hydrocarbon products, and could possibly be assigned Area Type "2." Recommendation for this possible change in ECP classification is requested.  
**RESOLVED**
- e. USTs that have been recently closed were assigned ECP area type "2" ("only release or disposal of petroleum products has occurred") because results from individual closure reports was not readily available. In many cases, this number may be a conservative estimate. Many of these tanks may be eligible to be assigned area type "1," depending upon the results of field investigation and analytical results ("no release or disposal has occurred").
- f. Total area calculation for the Station is 4,722, versus 4,738 on Table 1-5. Sixteen acres were added to Area Type 1 so that the total acreage would equal 4,738.

22. Section 3.5.11 Environmental Impact Statement Process: Updated information regarding EIR and EIS reports for Station closure is required.

#### **Chapter 4**

1. Section 4.1.4 Early Action Strategy: update on early action strategies required.  
**RESOLVED**
2. Section 4.1.5 Remedy Selection Approach, last Paragraph, first bullet: “Innovative/Emerging Treatment Technologies” is a draft. If the final has been prepared, an updated reference is required.
3. Section 4.1.6 Installationwide Source Discovery and Assessment Strategy: update may be required. A site walk for the visual assessment of aerial photograph features/anomalies could be added to this section.  
**RESOLVED**
4. Section 4.2.1.2 Aboveground Storage Tanks: update required on AST strategy.
5. Section 4.2.2 Hazardous Materials/Waste Management: the text states that visual inspections of the Desert Storm waste storage area, and pesticide storage areas at buildings 753, 493, 87, and 464 should be performed. Has this occurred? If so, is further evaluation required?  
**RESOLVED**
6. Section 4.2.7 RCRA Facilities (SWMUs):
  - a. Update may be required for any new actions that have been or will be performed for the various SWMUs/AOCs.
  - b. The text of this section (4.2.7) has been re-written/updated since the November 1996 preliminary draft, to reflect the changes made to Section 3.2.7 (RCRA Facilities, SWMUs/AOCs).
7. Section 4.2.10 Silver Recovery Units: the text states that a former silver recovery unit location at Building 312 should be inspected. Has this been done?  
**RESOLVED**
8. Section 4.3.3 Threatened and Endangered Species: Will be updated when information from the EIS becomes available.
9. Section 4.3.4 Surface Water and Wetlands: Will be updated when information from the EIS becomes available.
10. Table 4-1b Cleanup Sequence: the table is blank. Specific cleanup sequencing information is required.
11. Table 4-2 Environmental Restoration Planned Early Actions: update is required.  
**RESOLVED**
12. Table 4-3 Environmental Compliance Planned Early Actions: update is required.  
**RESOLVED**

### Chapter 5

This chapter has been updated since to reflect current FFA schedules, as of 21 November 1996. A careful review and revision of the text may still be required.

### Chapter 6

Information repeated in this chapter from other chapters may require further review.

**RESOLVED**

### Appendices

1. Appendix A Fiscal Year Funding Requirements/Costs
  - a. Table A-1 (Installation Restoration Program Summary): projected costs for future activities are required.
  - b. Table A-2 (Mission/Operational Compliance Summary): projected costs for future activities are required.
  - c. Table A-3 (Closure Related Compliance Summary): projected costs for future activities are required.
  - d. Table A-4 (Natural/Cultural Resources Summary): projected costs for future activities are required.
  - e. Table A-5 (Historical Expenditures by Operable Unit and Site): costs for FY 1996 are required.
  - f. Figure A-1 (Past Restoration Schedule): requires update to current year.
2. Appendix E Conceptual Site Models
  - a. Conceptual site models for sites 2, 3, 5, 17 and 24 have been updated, based on RI reports. All other conceptual site models are derived from the final Phase II RI/FS Work Plan (BNI 1995).

## LOCs Not Plotted in the BCP

- TAA 443
- TAA 626
- PCB T33
- PCB T95
- PCB T107
- OWS 392
- OWS 652
- OWS 658D
- OWS 674B
- OWS 675C
- OWS 851
- RFA 12 (sanitary sewer)
- RFA 32
- RFA 35
- RFA 50
- RFA 55
- RFA 56
- RFA 69
- RFA 89
- RFA 96
- RFA 103
- RFA 104 (located within IRP Site 8)
- RFA 105 (located within IRP Site 8)
- RFA 105 (located within IRP Site 8)
- RFA 121
- RFA 170
- RFA 237
- RFA 238
- RFA 247 (irrigation pipeline)