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MEETING MINUTES

Meeting Subject: BCT Briefing MCAS El Toro	Meeting Date: 20 February 1997 Meeting Time: 10:00 a.m. Meeting Place: Teleconference Meeting Notes Prepared By: Patrick Brooks						
Attendees: <table style="width: 100%; border: none;"> <tr> <td style="text-align: center; width: 33%;"><u>SWDIV</u></td> <td style="text-align: center; width: 33%;"><u>CLEAN II</u></td> <td style="text-align: center; width: 33%;"><u>Other</u></td> </tr> <tr> <td style="text-align: center;">Bernie Lindsey</td> <td style="text-align: center;">Patrick Brooks Craig Carlisle</td> <td style="text-align: center;">Glenn Kistner, U.S. EPA Tayseer Mahmoud, DTSC Joseph Joyce, El Toro Jeff Paul, U.S. EPA</td> </tr> </table>		<u>SWDIV</u>	<u>CLEAN II</u>	<u>Other</u>	Bernie Lindsey	Patrick Brooks Craig Carlisle	Glenn Kistner, U.S. EPA Tayseer Mahmoud, DTSC Joseph Joyce, El Toro Jeff Paul, U.S. EPA
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FFA SCHEDULE

The meeting began with a discussion of the proposed FFA schedule. Tayseer stated that DTSC supports the signing of two RODs this year. He asked that the submittal of the landfill Proposed Plans are staggered such that review of the landfills is not coincident with the review of OU1 and OU2A Proposed Plans. Some discussion ensued as how to best accommodate a schedule change for the landfills and whether one Proposed Plan or two would be best. Glenn stated that the proposed plan and ROD is generally one package. So, if two proposed plans are written, one for Sites 2 and 17, and one Sites 3 and 5, two RODs make the most sense. Joseph tentatively agreed with Glenn that two proposed plans and two RODs would be prepared for the landfills. Final details will be worked out between the Navy, Marine Corps, and the regulatory agencies.

PHASED APPROACH TO OU2A GROUNDWATER REMEDIATION

Bernie opened the discussion stating that unlike the OU2A proposed plan for soil, the proposed plan for groundwater would require additional agreement between the Navy and the regulatory agencies. U.S. EPA comments on the draft OU2A feasibility study can be interpreted as a rejection of the document. Many of the comments had to do with site characterization issues and concerns about the groundwater model. In previous meetings (i.e., November 6, 1996), the Navy and U.S. EPA had agreed that data collected during groundwater remediation pilot testing at Site 24 could be used to address U.S. EPA comments. The DTSC also agreed that some of the site characterization issues they were concerned with could be addressed during pilot testing.

Bernie described the anticipated schedule for groundwater remediation pilot testing and stated that completion of the pilot tests would be approximately 6 months after the scheduled submittal date of the OU2A draft final groundwater FS and Proposed Plan. If the OU2A Proposed Plan is to remain on schedule, an agreement with the U.S. EPA is necessary as to how to respond to their

MEETING MINUTES (Continued)

draft FS comments. Pat added that the vehicle to keep the Proposed Plan on schedule and address agency concerns is the U.S. EPA Presumptive Response Strategy Guidance Document. In the guidance document, the presumptive response strategy is described as implementation of site characterization and response actions in several steps, or phases, so information gained from earlier phases can be used to refine subsequent investigations, objectives or actions. The guidance document goes on to say that in general, groundwater response actions, especially those using extraction and treatment, should be implemented in more than one phase. This can take the form of two separate actions or one phased action. In two separate actions, an early or interim action is followed by a later more comprehensive action. The guidance document states that this approach is used when site characterization data are not sufficient to determine the likelihood of attaining long-term objectives (e.g., restoring groundwater) over all portions of the plume. Using this approach, two separate decision documents are required. This approach could be used to facilitate early action at OU2A with the final action encompassing OU1 as well. Phasing a single action requires only one decision document and is implemented in more than one design and construction phase. This approach is used when site characterization data are sufficient to determine that the likelihood of attaining long-term objectives is relatively high. Pat stated that he believes Site 24 data are sufficient to phase a single action, but two separate actions also seem appropriate given the two groundwater OUs.

Bernie reminded the group that the Navy is ready to allocate a significant amount of money to perform the pilot testing and that it is necessary for the regulatory to agree with the concept of addressing the draft FS comments via pilot testing and realize that the scheduled submittal date of the draft final groundwater FS is before pilot test data will be available. Pat had previously provided copies of the U.S. EPA guidance document to Bernie Lindsey, Tayseer Mahmoud and Larry Vitale for review. Joseph recommended that the BCT consider this issue and be ready to bring it to resolution by the next meeting, scheduled for February 27. The group agreed.

INSTITUTIONAL CONTROLS

Glenn asked to reschedule this topic so he could enlist the help of EPA's counsel.

LESSONS LEARNED FROM NORTON AFB REMOVAL ACTIONS

Glenn described some of the streamlined removal actions at Norton AFB and agreed to provide Tayseer with some example documentation.

SITE 25 PRELIMINARY COMMENTS

Bernie reminded the group that Site 25 had been recommended for No Further Action and solicited any preliminary comments from the group. Jeff Paul, U.S. EPA toxicologist, said he had a problem with the characterization of potential risk due to sediment in Agua Chinon Wash, Bee Canyon Wash, and Borrego Canyon Wash. Risk characterization was based on only one sample for those assessments. Pat clarified for the group that it had been agreed upon during Phase II RI Work Plan formulation that additional sediment sampling in those drainages was not necessary. Jeff restated that statistical analysis using one sample was simply not acceptable. He said that the surface water risk assessment was fine and suggested that if the BCT felt further

MEETING MINUTES (Continued)

sediment sampling was not necessary, a qualitative human health risk assessment for sediment was appropriate. Pat agreed to work with Andrea Temeshy, CLEAN II risk assessor, and provide the basis for a qualitative risk assessment for sediment at the next BCT meeting.

BASE CLOSURE PLAN

Joseph thanked the team for their assistance in preparing the BCP and reported that the document would be sent to Washington on Friday, February 21 (ahead of schedule) and other recipients would receive their document copies soon thereafter.

FUTURE MEETINGS AND AGENDA

The next BCT briefing will be on Thursday, February 27 at 10:00. It will be by teleconference. Pat volunteered to send out the agenda.