

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: 02221
IN REPLY REFERENCE: CTO-0079/0467

June 8, 1998

Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 57CS1.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA 92132-5190

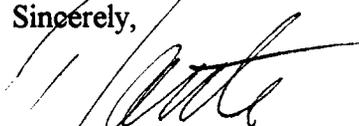
Subject: Clarification to Response to EPA Comments on the Draft Final Phase II Feasibility Study OU-3A Sites, Marine Corps Air Station, El Toro, California

Dear Mr. Selby:

It is our pleasure to submit this copy of the Clarifications to Responses to EPA Comments on Draft Final Phase II Feasibility Study Report for Operable Unit 3A Sites MCAS El Toro, California, prepared under Contract Task Order (CTO) 0079 and Contract No. N68711-92-D-4670. These clarifications were provided during the 1 June 1998 meeting with the EPA. We gratefully acknowledge the high level of cooperation and team work demonstrated by personnel from MCAS El Toro, Southwest Division, the United States Environmental Protection Agency, California Department of Toxic Substances Control, and Regional Water Quality Control Board - Santa Ana Region, during the execution of this project.

We appreciate the opportunity to be of service to you on this project. If you have any questions or would like further information, please contact me at (619) 687-8780.

Sincerely,



Dante J. Tedaldi, Ph.D., P.E.
Project Manager

DJT/sp

Enclosure: Response to EPA Comments on the Draft Final Phase II Feasibility Study
OU-3A Sites



Bechtel National, Inc. Systems Engineers-Constructors

RESPONSE TO COMMENTS
EPA EVALUATION OF MCAS EL TORO RESPONSE TO EPA COMMENTS ON
DRAFT FINAL PHASE II FEASIBILITY STUDY REPORT FOR OU-3A
MCAS EL TORO, CA AND EPA EXTENSION REQUEST

<p>Originator: Glenn R. Kistner, Project Manager U.S. EPA</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: 8 June 1998</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0079 File Code: 0222</p>
<p><u>RESPONSES TO COMMENTS</u></p>	<p><u>RESPONSES TO RESPONSES TO COMMENTS</u></p>
<p>3. <u>Attachment A, Response to Specific Comment 7.</u> Since degradation rates are highly variable and dependent on site-specific conditions like aerobic/anaerobic conditions, temperature, microbial population, concentrations of target and other contaminants, the specific phases (soil, water, air) present, etc., please provide a detailed description of how the degradation rates listed in this response were measured or obtained. Also, explicitly cite the study(ies) used as a basis for this response. To ensure concentration changes were not due to sample heterogeneity, the results of replicate analyses should have been included in the study cited. Generally, high concentrations of PAHs are toxic to the organisms, and studies are done on water with low concentrations; the relative concentrations in the soil at El Toro and the media/concentrations used in the study should be carefully compared and described.</p>	<p>RESPONSE 3: The discussion provided in the response to the Attachment A, Specific Comment 7, was referenced from the Draft Final Phase II Remedial Investigation Report OU-3A Sites where the remedial investigation for this site is presented. The values presented in the report and the response to the comments were obtained from literature sources referenced in the remedial investigation report.</p> <p>CLARIFICATION PROVIDED DURING 1 JUNE 1998 MEETING: The degradation rates for the COPCs addressed in the FS are presented for informational purposes only. While degradation will occur at some rate at the OU-3A Sites, to be conservative the assumption was made that no degradation would occur and therefore the alternatives do not consider the degradation rates in their implementation.</p>
<p><u>NEW COMMENTS</u></p> <p>1. <u>Leaching/Solubility Testing.</u> In the discussion of Alternative 3 in each Attachment (Sections A3.2.1.3, B3.3, and C3.3), it is stated that sampling of the soils would be performed to demonstrate that analyte concentrations do not exceed toxicity characteristic leaching procedure (TCLP), solubility threshold limit concentration (STLC), and total threshold limit concentration (TTLC) regulatory levels, so that the soils could be used as cover material at an on-Station landfill. It was not clear in the document or Response to Comment 6, DTSC, which references the RI for this site, if there has been specific testing to confirm the assumption that the threshold concentrations will not be exceeded. This is a critical point in the evaluation and selection of remedial action Alternative 3 for the three areas. Please confirm if</p>	<p><u>RESPONSES TO NEW COMMENTS</u></p> <p>RESPONSE 1: This type of testing was not performed as part of the remedial investigation. However, the analytical data obtained during the remedial investigation strongly suggest that the contaminant concentrations in soil at Site 12 would not exceed TCLP, STLC or TTLC levels.</p> <p>CLARIFICATION PROVIDED DURING 1 JUNE 1998 MEETING: Sections A3.2.1.3 (Page A3-6), A3.2.2.3 (Page 3-14) , B3.3 (Page B3-5), and C3.3 (Page C3-6), indicate that TCLP, STLC, and TTLC testing would be performed on excavated soil.</p>

RESPONSE TO COMMENTS
EPA EVALUATION OF MCAS EL TORO RESPONSE TO EPA COMMENTS ON
DRAFT FINAL PHASE II FEASIBILITY STUDY REPORT FOR OU-3A
MCAS EL TORO, CA AND EPA EXTENSION REQUEST

Originator: Glenn R. Kistner, Project Manager U.S. EPA	CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0079 File Code: 0222
To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro	
Date: 8 June 1998	
this testing has been done or is planned.	



BECHTEL NATIONAL INC.

DRAFT CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

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

Document Control No.: CTO-0079/0467

File Code: 02221

TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 57CS1.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA. 92132-5190

DATE: June 8, 1998
CTO #: 079
LOCATION: MCAS El Toro

FROM: D. J. Tedaldi, Ph.D., P.E., Project Manager

DESCRIPTION: Clarification to Response to EPA Comments on the Draft Final Phase II Feasibility Study OU-3A Sites - DTD 8 June 1998

TYPE: Contract Deliverable (Cost) CTO Deliverable (Technical) X Other
VERSION: Draft Final REVISION #: 0

ADMIN RECORD: Yes X No Category Confidential

SCHEDULED DELIVERY DATE: 6/8/98 ACTUAL DELIVERY DATE: 6/8/98

NUMBER OF COPIES SUBMITTED: 10/4C/1E

COPIES TO (Include Name, Navy Mail Code, and No. of Copies):

Table with 3 columns: SWDIV, BECHTEL (Distributed by Bechtel), OTHER (Distributed by Bechtel). Lists names and codes for distribution.

O = Original Transmittal Sheet
C = Copy Transmittal Sheet
E = Enclosure

Date/Time Received