



PROJECT NOTE NO.  
PN-0284-18  
CLE-C01-01F284-I2-0011

PROJECT NO.  
01-F284-H6

M60050\_004348  
MCAS EL TORO  
SSIC NO. 5090.3.C

CONFIRMATION OF:	CONFERENCE	X	DATE HELD	06 March 1995
	TELECOM		DATE ISSUED	20 March 1995
	OTHER		RECORDED BY	Daryl Hernandez/CH2M HILL <i>DH</i>
			PLACE	Santa Ana, California

SUBJECT  
Contract Task Order No. 0284  
Meeting Minutes for CERFA/EBS Comment Resolution Meeting  
Marine Corps Air Station El Toro

PARTICIPANTS: (\* DENOTES PART-TIME ATTENDANCE)

See Attached

ACTION  
REQ'D. BY

ITEM

A Community Environmental Response Facilitation Act (CERFA)/Environmental Baseline Survey (EBS) Comment Resolution Meeting was held on 06 March 1995 at CH2M HILL's Santa Ana Office. Participants in the meeting included representatives from Marine Corps Air Station (MCAS) El Toro (Station), Southwest Division, Naval Facilities Engineering Command (SWDIV), U.S. Environmental Protection Agency (EPA), California Environmental Protection Agency (Cal-EPA) - Department of Toxic Substance Control (DTSC), Comprehensive Long-term Environmental Action Navy (CLEAN) II contractor, and CH2M HILL. A list of attendees is provided as an attachment to this project note.

The purpose of the meeting was to discuss and resolve EPA and Cal-EPA comments on the Draft CERFA and EBS Reports (11 November 1994) for MCAS El Toro. Copies of the agencies' comments are provided as an attachment to this project note. A list of action items developed during the meeting is also provided as an attachment to this project note.

**Introduction:** Joseph Joyce/Code 1832.JJ, the BRAC Environmental Coordinator (BEC), opened the meeting with introductions for the benefit of new attendees.

**Meeting Agenda:** Bonnie Arthur/EPA led discussions on the meeting agenda by asking all the participants for input on key issues that should be discussed during the meeting. The following agenda was developed for the meeting:

- 12:55 Discussion of Schedule
- 1:15 Resolution of EPA/DTSC Comments
- 4:00 Groundwater Plumes - for CERFA
- 4:30 Radiological Health - Resolution of Data Gaps
- 4:45 CERFA Parcel Map
- 5:00 Bordier's Nursery Tour



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	<p><b>Schedule:</b> The Final CERFA and EBS Reports are due to Naval Facilities Engineering Command Headquarters (Navy Headquarters) on or before 01 April 1995. B. Arthur said that EPA is expecting to provide concurrence by 27 March 1995. Therefore, EPA requested that written responses to their comments be submitted on or before 24 March 1995. In an effort to expedite concurrence from EPA, CH2M HILL agreed to try to provide responses by 20 March 1995. B. Arthur and Ramon Mendoza/EPA will share responsibilities as the EPA point of contact (POC) for CERFA and EBS issues that may develop prior to submittal of the final reports. Ron Okuda, Francesca D'Onofrio, and Juan Jimenez of Cal-EPA will act as the State POCs. Vish Parpiani/MCAS El Toro will serve as the Station POC.</p> <p><b>EPA/Cal-EPA Comments:</b> During this portion of the meeting, each General Comment addressed in the EPA and Cal-EPA CERFA/EBS Comment Letters (dated 09 February 1995 and 10 February 1995, respectively) was discussed.</p> <p><u>EPA General Comments</u></p> <ol style="list-style-type: none"> <li><i>Use of Term "Uncontaminated"</i> - The Navy agreed to redefine the term "uncontaminated" to include only Area Type 1 locations on-Station.</li> <li><i>Use of Term "Locations of Concern"</i> - Mike Arends/CH2M HILL explained that the term "locations of concern" was developed for MCAS El Toro BCP/EBS-related locations of environmental concern to minimize confusion with other environmental projects being conducted at the Station. For instance, the term "site" is used for areas being investigated under the Remedial Investigation/Feasibility Study (RI/FS) program. The term "solid waste management unit/area of concern" (SWMU/AOC) refers to areas that were investigated as part of the Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA).  Because it was not clear to agency reviewers, it was agreed that the term "location of concern" would be explained in more detail in the Final EBS Report.</li> <li><i>Categorization of PCB Transformers</i> - The Navy agreed with the agency's position that PCB transformers with no evidence of leakage can be designated as Area Type 1. Tim Smith/CH2M HILL said that as part of the updated version of the BCP, a survey of current and former PCB transformer locations had recently been completed for the Station. As a result of the survey, only one transformer (located outside Building 371) was identified to have leaked. This former transformer location is categorized as an Area Type 7. A past release has been documented at one other PCB transformer location (outside of Building 427); this location was sampled during the RFA and will undergo further evaluation under CLEAN II. It is categorized as Area Type 7. All of the remaining current and former PCB transformer locations are categorized as Area Type 1. The final version of the EBS Report will be updated to reflect the revised categorization of PCB transformer locations.</li> <li><i>Asbestos</i> - The Navy agreed to revise the EBS report to clarify that buildings with asbestos-containing materials are not designated as LOCs. The Station's</li> </ol>

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	<p>buildings will all be classified as Area Type 1. If a building contains asbestos (or lead-based paint), this will need to be disclosed to the buyer.</p> <p>5. <i>Mapping of Groundwater Contamination</i> - B. Arthur asked if the groundwater plumes were included in Figure 4-1 (Environmental Condition of Property). T. Smith said that the known contamination plumes with concentrations above maximum contaminant levels (MCLs) were plotted on the figure. These plumes include the following:</p> <ul style="list-style-type: none"> <li>o Main chlorinated volatile organic compound (VOC) plume emanating from the southwest quadrant of the Station</li> <li>o Petroleum hydrocarbon plume located near Tank Farm 2</li> <li>o Chlorinated VOC plume located near Site 2</li> <li>o Petroleum hydrocarbon plume located at Tank 398</li> <li>o Petroleum hydrocarbon plume located near Tank Farms 5 and 6</li> </ul> <p>The groundwater contour lines shown in Figure 4-1 are based on groundwater data collected in the second round of groundwater sampling (i.e., June to December 1993). For the groundwater plumes, a 100-foot buffer zone has been placed on the MCL contour lines.</p> <p>B. Arthur suggested that the groundwater plumes be plotted to the detection limits rather than the MCLs. Andy Piszkin/Code 1832.AP asked why EPA prefers plotting the groundwater plumes to the detection limits rather than MCLs when soil contamination is typically plotted to preliminary remediation goals (PRGs) concentrations rather than detection limits. An action item was assigned to R. Mendoza to provide EPA policy regarding contouring contamination plumes in groundwater as applied to CERFA determination (i.e., MCLs versus detection limits).</p> <p>B. Arthur suggested that the 100-foot buffer zone could be applied to just the downgradient portion of the contamination plumes and not around the entire boundaries of the plumes. A. Piszkin agreed with use of a 100-foot buffer, but suggested that the buffer be applied to the entire plume.</p> <p>R. Mendoza asked how the first and second round of groundwater data for Site 2 compared. CH2M HILL provided a demonstration of the plume dimensions from the first and second sampling rounds on a PC loaded with an ARC/INFO Geographical Information System (GIS) database for MCAS El Toro. The contamination plumes identified from the two events were overlaid on the base map, showing that there has been some minor migration of the groundwater plume.</p> <p>EPA agreed to provide guidance on how to address the groundwater contamination plumes at the Station with respect to CERFA eligibility.</p> <p>6. <i>Use of 100-foot Buffer Zones</i> - M. Arends explained that the buffer zones were established by the members of the first BRAC Cleanup Team (BCT) for MCAS El Toro. In general, a 100-foot buffer zone was applied to every LOC identified on-Station. No buffer zone was applied to buildings with asbestos or lead-based</p>

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	<p>paint. The purpose of the buffer zone was to allow for potential contamination migration, site access that may be required for remediation activities, and uncertainty regarding some of the LOC locations. The first BCT considered using different sized buffer zones for various LOCs, although they ultimately agreed that a standard sized buffer zone (i.e., 100-foot radius) would be appropriate.</p> <p>Maria Gillette/Cal-EPA said the State prefers a minimum buffer zone of 100 feet, unless the Navy can provide adequate reason for reducing the size. B. Arthur said EPA would consider a 50-foot buffer zone. CH2M HILL was assigned an action item to assess the increase of CERFA-eligible land by using the following buffer zone strategy:</p> <ul style="list-style-type: none"> <li>o 100-foot buffer zone             <ul style="list-style-type: none"> <li>- Groundwater contamination plumes</li> <li>- RI/FS sites</li> </ul> </li> <li>o 50-foot buffer zone             <ul style="list-style-type: none"> <li>- Underground and aboveground storage tanks</li> <li>- Oil/water separators</li> <li>- Less than 90-day accumulation areas</li> <li>- PCB transformer locations with documented releases</li> <li>- RCRA SWMUs/AOCs</li> </ul> </li> <li>o No buffer zone             <ul style="list-style-type: none"> <li>- Unpaved areas around or adjacent to the original airfield</li> </ul> </li> </ul> <p>7. <i>Categorization of Airfield Operations</i> - B. Arthur said that the Draft EBS Report indicated that there may be some environmental problems/issues within the airfield operation area that would prevent this area from being categorized as an Area Type 1. Some of these problems/issues include aircraft refueling areas where samples that were collected during the RFA and soil gas surveys that were conducted for the RI/FS.</p> <p>Daryl Hernandez/CH2M HILL stated that there are six aircraft refueling areas on-Station. Four of the refueling areas are located in the northeast portion of the Station, and two are located in the southeast portion of the Station. Soil samples were collected from the runoff drainage paths of the four refueling areas in the northeast area during the RFA (SWMUs/AOCs 15, 16, 257, and 258). As a result of the sampling effort, further action was not recommended in the RFA Report. The other two refueling areas are located near RI/FS Site 19. These refuelers are located within a newer portion of the flightline and, therefore, will be categorized as Area Type 7 (the buffer zone for the fuel supply lines cover these two refueling areas).</p> <p>R. Mendoza asked about the former practice of applying waste oil to the unpaved areas of the airfield for dust suppression. D. Hernandez explained that during the 26 May 1994 interview session with past and present Station personnel, it was reported that the Station's Facility Maintenance Department (FMD) (currently known as AC/S Installations) had routinely applied waste oil</p>

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	<p>onto the unpaved surfaces of the flightline for dust control. The interview panel was not able to identify specific areas where the oil was spread. Since the Station was commissioned in 1943, each of the runways has been extended.</p> <p>B. Arthur said that only the paved portions of the original flightline should be considered as Area Type 1. Because this portion of the flightline has remained paved since the commission of the Station, it is unlikely that waste oil was spread beneath the original runways and taxiways. All extension areas and unpaved areas of the original flightline boundaries should be categorized as Area Type 7. No buffer zones should be applied to these areas of the flightline.</p> <p>8. <i>Criteria for CERFA-Eligible Property</i> - The Navy agreed to request concurrence for all CERFA-eligible property (Area Type 1) regardless of size, location, and/or ease of early transfer. Parcel delineations presented in the Draft CERFA and EBS Reports will remain in the reports to highlight the large areas of property that may be potentially transferred or developed early in the closure process.</p> <p>9. <i>Pesticides</i> - B. Arthur asked if the Navy has developed a position for dividing and/or evaluating the two parcels (CP-06 and CP-15) where elevated pesticide concentrations above PRGs were measured. A. Piszkin said that the Navy has not developed a position, but they are considering averaging the concentrations within each parcel.</p> <p>B. Arthur said the EPA would prefer "carving out" the sample locations with high concentrations and redefining the parcel boundaries. An action item was assigned to EPA to develop ideas for potentially carving out the sample locations where elevated concentrations of pesticides were measured.</p> <p>B. Arthur said that if storage of pesticides had occurred at any of the four pesticide handling areas that were sampled during the confirmation sampling program, then that handling area could not be considered as CERFA-eligible. D. Hernandez said that storage has occurred at the pesticide handling areas located in CP-06 and CP-15. The boundaries for these parcels will be redefined to exclude the pesticide handling areas where storage has occurred.</p> <p>10. <i>Records Search</i> - The Navy agreed to include specific document references in the Final EBS Report.</p> <p><u>Cal-EPA General Comments</u></p> <p>R. Okuda/Cal-EPA stated that the issues identified in the State's CERFA/EBS Comment Letter dated 10 February 1995 had been addressed during the discussion of EPA's general comments.</p> <p><u>EPA Specific Comments</u></p> <p><i>Attachment 3, Page 1, Parcels CP-10 and CP-11</i> - EPA considers ordnance to potentially include hazardous substances. If storage of ordnance has not impacted public health or the environment, EPA may concur on the property with ordnance storage as being CERFA-eligible.</p>

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	<p>A. Piszkin suggested that the storage bunkers be handled similar to the buildings with asbestos or lead-based paint. He said that the storage bunkers did not need to be considered as LOCs and should remain categorized as Area Type 1.</p> <p>In the absence of information on ordnance storage at the Station, M. Gillette and R. Mendoza stated that the storage bunkers should be categorized as Area Type 7. They said that EPA and the State will need more information about the storage practices, types, and quantities of ordnance stored before the bunkers could be categorized as Area Type 1. An action item was assigned to the Navy and CH2M HILL to inquire about additional information concerning ordnance storage at the Station. J. Joyce said that it may be difficult (or impossible) for the Station to provide detailed information on ordnance storage to the BCT.</p> <p><i>Page 3-23, Additional Landfill Area</i> - EPA's comment stated that it is unclear that the additional landfill area is eligible for uncontaminated status, unless investigation has already been conducted and the area has been determined to be clear.</p> <p>D. Hernandez explained that this area was identified during the May 1994 interviews with former and current Station employees. According to the employees that were interviewed, an access road to the Perimeter Road Landfill used to exist in this general area. This area has been identified as an LOC and has been categorized as Area Type 7. B. Arthur agreed with the area type assigned to this area.</p> <p><b>Radiological Health - Resolution of Data Gaps:</b> T. Smith explained that an extensive search for information concerning the radium paint operations at the Station has been conducted. The available knowledge of this past operation, however, is very limited. Apparently, radium paint activities were conducted during the 1940s. A drawing from the 1940s indicates that a radium paint room was located in Building 296, where aircraft refurbishing operation took place. It is not known if radi/um paint operation occurred beyond the 1940s.</p> <p>During the May 1994 interviews, it was reported that aircraft dials with radium paint may possibly have been disposed of into the landfills, but this could not be confirmed as fact. The interviewees could only say that it was common past practice to dispose of "everything" into the landfill. The groundwater in the vicinity of the landfills is being monitored for gross-alpha and -beta levels.</p> <p>M. Gillette suggested contacting RASO for additional information about the radium paint operations. Also, M. Gillette said that an additional section should be included in the Final EBS Report that addresses the radium paint issue. This section should include the same level of detail that was included in the BCP on this issue.</p> <p><b>Bordier's Nursery Tour:</b> The meeting was adjourned at approximately 5:00 p.m. Immediately following the meeting, representatives from EPA, Cal-EPA, and CH2M HILL visited Bordier's Nursery (CP-06). The purpose of the site visit was to observe the boring location (CP06-B3) within CP-06 where elevated concentrations of pesticides were detected. D. Hernandez escorted the group to the boring location for a visual inspection of the area.</p> <p>Attachment</p>



SUBJECT El Dorado  
Monday, March 6

BY \_\_\_\_\_ DATE \_\_\_\_\_  
 SHEET NO. \_\_\_\_\_ OF \_\_\_\_\_  
 PROJECT NO. \_\_\_\_\_

Name	Organization	Phone / Fax
Mike Arends	CH2M HILL	714/250-0555 x2364
JOSEPH JOYCE	MCAS EL DORADO	714/726-3470 <sup>FAX 586</sup>
ANDY PISZKIN <sup>(FAX 619-532-2469)</sup>	NAVY - SOUTHWEST DIV	619-532-2635
MARIA GILLETTE <sup>(FAX 310-590-4932)</sup>	CAL EPA	310-590-4990
RONALD OKUDA	" CAL - EPA	310-590-4335
VISH PARDIANI <sup>(714-726-6586)</sup>	MCAS EL DORADO	714-726-3388
Daryl Hernandez	CH2M HILL <sup>(FAX 714/250-6661)</sup>	714-250-0555 x2349
Ramon Mendez	US EPA	415 744 2407 / x1916 fax
DANTE TEDALDI	BECHTEL NATIONAL, INC.	619 687 8780 x8787
Francesca D'Onofrio	DTSC	916-323-3446 / 3550
Tim Smith	CH2M HILL	714/250-0555 x2361
Bonnie Arthur	USEPA	415/744-2389 <sup>FAX x191</sup>
Juan M. Jimenez	CAL EPA	310 590 4919 / 4922

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## CLEAN TRANSMITTAL/DELIVERABLE RECEIPT

CONTRACT N68711-89-D-9296

DOCUMENT CONTROL No.: CLE-C01-01F284-I2-0011

TO: Southwest Division  
Ms. Gena McClain, Code 0232  
Head, Environmental ACO I Branch  
Naval Facilities Engineering Command  
Contracts Department, Room 131  
1220 Pacific Highway  
San Diego, California 92132-5187

DATE: 20 March 1995  
CTO#: 0284  
LOCATION: MCAS EI Toro  
TASKWORK ELEMENT: \_\_\_\_\_

FROM: *M. W. Arends*  
Mike Arends/Project Manager

*Miriam E. Ferbrache for*  
Ken Tomeo/ Resource Center Manager

DESCRIPTION: Project Note No. 0284-18, Meeting Minutes for EBS Comment Resolution Meeting, MCAS EI Toro

E:  Contract Deliverable  CTO Deliverable  Change Notice/Project Note  Other

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

ADMIN RECORD Yes  No  Category \_\_\_\_\_ Confidential   
(PjM to identify)

NEGOTIATED DELIVERY DATE: \_\_\_\_\_ ACTUAL DELIVERY DATE: \_\_\_\_\_

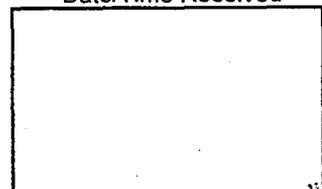
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Copies To:	<u>J. Rogers - Code 18C1 w/attach</u>	<u>K. Tomeo - CH2M HILL w/attach</u>
	<u>A. Piszkin - Code 1831.AP w/attach</u>	<u>M. Huddleston - CH2M HILL w/ attach</u>
	<u>D. Crawley - Code 1831.DC w/attach</u>	<u>File - PMO w/attach</u>
	<u>L. Tedeski - JEG/Pas w/o attach</u>	<u>File - CH2M HILL w/attach</u>
	<u>M. Pan - IT w/ attach</u>	<u>D. Hernandez - CH2M HILL w/attach</u>

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