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MCAS EL TORO
SSIC #5090.3



Opportunity
Ahead

MCAS EL TORO LOCAL REDEVELOPMENT AUTHORITY • Jenize M. [unclear]
MCAS EL TORO MASTER DEVELOPMENT PROGRAM • Courtney C. Wiercioch, Manager

June 7, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
AC/S Environmental (1AU)
Marine Corps Air Station El Toro
P.O. BOX 95001
Santa Ana, CA 92709-5001

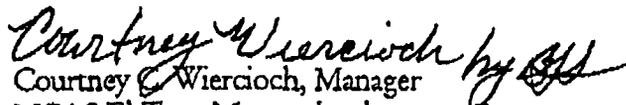
Subject : Proposed Plan for Cleanup at Three Shallow Soil Sites
(Sites 8, 11, and 12)

Dear Mr. Joyce:

Thank you for the opportunity to comment on the subject document dated May 1999. Our comments and questions are attached for your consideration in the final plan. A response to the attached would help us in evaluating the compatibility of the Proposed Plan with the Reuse Plan for MCAS El Toro.

Should you have any questions, please contact Polin Modanlou at (714) 834-3156.

Sincerely,


Courtney Wiercioch, Manager
MCAS El Toro Master development Program

Attachment

Cc: Tayseer Mahmoud, DTSC
Glenn Kistner, USEPA
Patricia Hannon, RWQCB
Peter Janicki, IWMB
Steve Sharp, LEA



ATTACHMENT

QUESTIONS REGARDING PROPOSED PLAN

The review of the Proposed Plan for Sites 8, 11, and 12 raises a number of questions. Obtaining a response to these questions would help the Local Redevelopment Agency (LRA) in evaluating the compatibility of this Proposed Plan with anticipated reuse for Sites 8, 11, and 12 and Sites 2 and 17. These questions are listed below.

DON/USMC proposes to use the contaminated soil excavated from Sites 8, 11, and 12 that is not hazardous, but that exceeds action levels for Sites 8, 11, and 12 as foundation material for the landfill caps at two inactive on-station landfills (Sites 2 and 17). See Proposed Plan at 7. We are not aware that use of contaminated soil from Sites 8, 11, and 12 as part of the foundation material for the cover of Sites 2 and 17 was considered in the Sites 2 and 17 Feasibility Studies and Proposed Plan. While use of this contaminated soil as part of the foundation material for the cover of Sites 2 and 17 was mentioned in the Site 2 and 17 draft Record of Decision (ROD), no technical analysis appears to have been provided in support of this proposal. A number of concerns exist with respect to use of contaminated soils from Sites 8, 11, and 12 as part of the foundation material for the cover of Sites 2 and 17 as indicated below:

- What additional features or modification will DON/USMC include in the closure design for sites 2 and 17 to protect human health and the environment from the disposal of contaminated soil in Sites 2 and 17?
- DON/USMC indicates that no increase in risk will occur at the landfill sites as a result of disposal of contaminated soil at Sites 2 and 17. See Draft ROD at 7-9. Has DON/USMC quantified this risk? If so, could DON/USMC provide this risk assessment to the LRA for review?

- Has DON/USMC considered and quantified potential additional impacts to groundwater as a result of disposal of contaminated soil at Sites 2 and 17?
- Has DON/USMC considered and quantified potential additional settlements that could result from the added mass of soil disposed of at Sites 2 and 17?
- Disposal of contaminated soil is not generally approved by regulatory agencies at unlined landfills. What would be the regulatory status of the excavated soils that DON/USMC proposes to use at Sites 2 and 17 (e.g., special waste? designated waste?). Has DON/USMC received approval from any regulatory agencies for disposal of contaminated soil at Sites 2 and 17?
- Will disposal of contaminated soil at Sites 2 and 17 change the regulatory status of Sites 2 and 17? (Stated alternatively, would these sites be considered active disposal sites and be subject to permitting, design, construction, monitoring, and closure requirements different from the applicable or relevant and appropriate requirements considered thus far by DON/USMC?) What regulations and/or requirements would apply if sites 2 and 17 are considered "active" landfill sites as a result of the placement of contaminated soils from Sites 8, 11, and 12? What is the position of the regulatory agencies with respect to this issue?
- DON/USMC mentions other appropriate off-station disposal alternatives for the contaminated soil. See Proposed Plan at 6 and 7. Could DON/USMC provide more detailed information regarding these other off-station disposal alternatives for the contaminated soil?

DON/USMC proposes to excavate soils at Sites 8, 11, and 12 until it confirms that all the contaminated soil that could cause an unacceptable risk to human health has been removed. See Proposed Plan at 7. This statement raises a number of questions as follows:

- Could DON/USMC clarify what it considers an unacceptable risk for exposure for the soil remaining at these three sites? What risks determinations or soil cleanup levels will be made or established by DON/USMC before the field work starts?
- How will the unacceptable risk be calculated and evaluated in the field as excavation of the contaminated soil proceeds?
- On page 5 of the Proposed Plan, DON/USMC presents a site-by-site Summary of Risk Assessment and Recommended Actions. For Unit 2 of Site 11 (for which the cancer risk is 6 additional cases for 1,000,000 and the noncancer risk is 0.3), DON/USMC will perform remedial action by removal of the contaminated soil. However, for Units 1, 2, 3, and 4 of sites 8 and Units 1, 2, and 4 of Site 12, each of which exhibits a higher risk than Unit 2 of Site 11 (the cancer risk ranges from 20 to 80 additional cases for 1,000,000 and the noncancer risk ranges from 0.79 to 4.6), DON/USMC recommends no further action. Could DON/USMC clarify what is the risk beyond which remedial action will be implemented at the sites and what is the decision making process to perform remedial action at the sites?
- Will DON/USMC define action levels for each chemical compound detected and/or likely to be present at the site (i.e.: chemical-specific maximum allowable concentration that could remain in the soil at Sites 8, 11, and 12)? If so, how will these levels be defined?
- What would these action levels be?
- Are these action levels site-specific?

- Are there base-wide applicable action levels for various chemicals of
- Are these base-wide action levels used at Sites 8, 11, and 12?

DON/USMC proposes to collect and test soil samples once the excavation is complete to confirm that all the contaminated soil that could cause an unacceptable risk to human health has been removed. See Proposed Plan at 7. How many samples will be collected, how will they be tested, and what will be the approach to develop the sampling plan to confirm that all the contaminated soil that could cause an unacceptable risk to human health has been removed from Sites 8, 11, and 12?

DON/USMC proposes to backfill the excavated areas using clean, compacted fill materials as appropriate. See Proposed Plan at 7. What will be the origin of the backfill material? Will the backfill material be tested in a laboratory to confirm that it is not contaminated? What will be the degree of compaction to which the backfill material will be compacted in the field?

DON/USMC proposes to no restrictive covenants or monitoring for Sites 8, 11, and 12 because contamination will be removed from the sites. See Proposed Plan at 7. Will there be any types of restriction on site use, any institutional controls, any site specific requirements for any construction, or restriction on excavation of soil at Sites 8, 11, and/or 12 once remediation is complete?