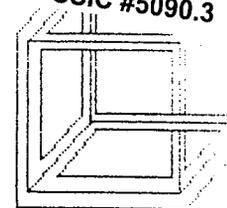


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MCAS EL TORO  
SSIC #5090.3



Research • Service

7 June 1999

To: Mr. Joseph Joyce  
BRAC Environmental Coordinator  
Commanding General  
AC/S, Environment (1AU)  
MCAS El Toro  
Building 368  
Santa Ana, CA 92709-5001

Telephone 714-726-3470

Project # - El Toro -  
re: OU 3, Sites 8, 11, 12 / Proposed Plan

Dear Mr. Joyce:

The attached statement is submitted to you as Community Co-Chair of the El Toro RAB, and designated receiver of comment for this Proposed Plan. The submission objective is to comply with the CERCLA process for the ROD derived from El Toro and provide written documentation of my comments and questions. It is submitted as a member of the public, who also serves as an El Toro RAB member. Courtesy copies are being sent to Glenn Kistner (USEPA) and Marsha Mingay (Cal-EPA).

Yours sincerely,

*CHARLES R. BENNETT*

Charles R. Bennett Ph. D.

c: Greg Hurley (Community Co-Chair/ El Toro RAB)  
Glenn Kistner  
Marsha Mingay

**BL Associates**  
224 W. Jacaranda Place  
Fullerton, CA 92632  
714-773-5525

June 6, 1999

Comment regarding:

Proposed Plan -  
Cleanup at Three Shallow Soil Sites  
Marine Corps Air Station, El Toro, California

**"It is much easier to be critical than to be correct."  
(Benjamin Disraeli)**

For the Sites 8, 11, and 12

A. The concept of the chosen preferred Remedy of Alternative 3 is a sound one. That 25,000 cubic yards of contaminated soil are to be excavated and used as foundation layer in one of the larger on-Station landfills that are being capped, is an efficient proposal and is to be encouraged. This is a cost effective remedy.

B. One concern of this remedy, however, is that during the design and implementation phase of this remedy, the excavated material will exacerbate the landfill to which the material is to be conveyed. I urge that during the design phase, sufficient concern be made of future impacts to the destination landfill. These possible impacts would include: 1) the risk of excessive, future erosion conditions and 2) the land uses that may occur in the vicinity of the destination landfill.

Will these concerns be addressed during the design and implementation phase of this remediation?

C. Specifically regarding the excavation of Unit 5 of Site 8, there may be a significantly low estimate of the cost of this remedy, based upon information that has been supplied to the public. An estimated cost of \$1.2M has been made for Site 8 (this also includes both Units 3 & 5), with Unit 5 having an estimated volume of 18,500 cubic yards of materials to be excavated. This computes to a cost of less than \$65 per cubic yard for Unit 5. Contrast this with the estimate that Craig Carlisle of the Bechtel Corporation made in 1996 regarding Site 5, when the same concept was reviewed for excavating and consolidating Site 5 materials. In that case an estimated cost exceeded \$7M for an estimated volume of 30,000 cubic yards. This computes to a cost of over \$233 per cubic yard for Site 5. That these two estimates are in such sharp contrast strongly suggests that one or both of these estimates is in grave error. Thus, either Unit 5 consolidation could eventually cost \$4.8M rather than \$1.2M, or Site 5 consolidation would have cost \$1.8M rather than \$7M.

Can the DoN reconcile these contradictory estimates?