

**RESPONSE TO COMMENTS
DRAFT RECORD OF DECISION
OPERABLE UNIT 3A SITES 8, 11, AND 12
MCAS EL TORO, CALIFORNIA**

September 1999

<p>Originator: Glenn Kistner RPM U.S. EPA</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: 10 August 1999</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0164 File Code: 02221</p>
<p><u>GENERAL COMMENTS</u></p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p>
<p>1. Please modify the ROD to reflect the new alternative disposal option (offsite) that was selected.</p>	<p>RESPONSE 1: The Draft Final ROD has been revised to reflect DON's decision to dispose of contaminated soil from Sites 8, 11, and 12 off-Station and to reflect DON's decision to remove Sites 8 and 12 from the ROD. Please see the response to comment 2.</p>
<p>2. Please modify the text to reflect the recommendations of the Historical Radiological Assessment (HRA) which lists certain areas for conducting a radiological survey that are also listed in the ROD as no further action.</p>	<p>RESPONSE 2: DON has revised Section 2 of the Draft Final ROD to address the HRA. DON has also decided to delete Sites 8 and 12 from the Draft Final ROD. This decision was made to allow DON to perform a radiological survey of these sites, analyze the survey results, and evaluate the impact on the proposed remedial alternative if radioactive materials are found to be present at either site.</p>
<p>3. EPA recommends that a contingency remedy (excavation) be added to the text to address the potential of discovering radium, etc., at the sites.</p>	<p>RESPONSE 3: Please see the response to Comment 2. The ROD has been revised to delete Sites 8 and 12 pending the evaluation of a radiological survey at Sites 8 and 12.</p>
<p>4. To what specific risk level will the excavated areas be remediated to? The text in the Declaration, Section 6 and Section 9 should be modified to reflect the specific risk level that will be attained through excavation. Some suggested language would be to state that: "excavation at the Units would achieve a 10⁻⁶ risk level under a residential scenario, allowing for unrestricted use."</p>	<p>RESPONSE 4: The text of the ROD (Declaration, Section 9) has been modified to indicate that the remedial action will reduce the concentration of contaminants at Site 11 to approximately 10⁻⁶ under a residential scenario. This is within the range considered allowable by the U.S. EPA, and will allow for unrestricted use.</p>
<p>5. Also suggest adding language stating that areas not requiring excavation are also suitable for unrestricted use.</p>	<p>RESPONSE 5: The ROD has been revised as suggested to state that areas not requiring excavation (Unit 3 at Site 11) are also suitable for unrestricted use (Declaration, Section 9) because the baseline risks at this unit are less than 10⁻⁶ under a residential scenario.</p>
<p>6. Section 11 should be modified to reflect the change in the disposal of the excavated material.</p>	<p>RESPONSE 6: Section 11 has been revised to reflect DON's decision to dispose of contaminated soil from Sites 8, 11, and 12 off-Station and to reflect DON's decision to remove Sites 8 and 12 from the ROD.</p>

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MCAS EL TORO
SSIC #5090.3

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<p>Originator: Bertrand S. Palmer, Ph.D., P.E. GeoSyntec Consultants</p> <p>To: Polin Modanlou MCAS El Toro Master Development Program</p> <p>Date: 12 August 1999</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0164 File Code: 02221</p>
<p><u>GENERAL COMMENTS</u></p> <p>INTRODUCTION</p> <p>In May 1999, the Department of the Navy/United States Marine Corps (DON/USMC) issued the "Proposed Plan for Clean-up at Three Shallow Soil Sites (Sites 8, 11, and 12)" (Proposed Plan) at Marine Corps Air Station (MCAS) El Toro. The Local Redevelopment Authority (LRA) provided comments to DON/USMC on the Proposed Plan in a memorandum dated 6 June 1999. DON/USMC responded to the LRA comments on the Proposed Plan in a Responsiveness Summary (RS) transmitted by letter dated 20 July 1999 from Mr. Thurman Heironimus of Bechtel to Mr. Richard Selby, Contracting Officer, Naval Facilities Engineering Command, Southwest Division. Prior to issuance of the RS, DON/USMC issued the Draft Record of Decision (ROD) for Operable Unit 3A, Sites 8, 11, and 12 (Draft ROD), dated June 1999.</p> <p>At your request, GeoSyntec reviewed the Draft ROD and RS. The purpose of this memorandum is to present in summary form GeoSyntec's comments on the principal issues and concerns raised by the Draft ROD and RS. GeoSyntec recommends that these issues and concerns be discussed with DON/USMC and resolved before the ROD for Sites 8, 11, and 12 is finalized.</p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p> <p>RESPONSE: Responses to the LRA's comments are presented on the following pages. DON will incorporate responses to these issues and concerns into the Draft Final RODs for Sites 8, 11, and 12. This response to comments matrix will be transmitted to the LRA and regulatory agencies along with the Draft Final RODs to allow time for review before the ROD is signed.</p> <p>As noted in the responses below, DON has decided to remove Sites 8 and 12 from the Draft Final ROD. This decision was made to allow DON to perform a radiological survey of these sites, analyze the survey results, and evaluate the impact on the proposed remedial alternative if radioactive materials are found to be present at either site.</p>

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<p>DISCUSSION</p> <p><u>Issue/Concern No. 1</u></p> <p>In the Draft ROD, DON/USMC selected Alternative 3 as the remedy for remediation of contaminated soils at Site 8 Units 3 and 5, Site 11 Units 1 and 2, and Site 12 Unit 3. (See, e.g., Draft ROD at Section 9) In the descriptions of Alternative 3 presented in the Draft ROD, DON/USMC states that soil excavated from Sites 8, 11, and 12 will be recycled as cover material at the on-station Sites 2 and 17 landfills. In the RS, DON/USMC states that (1) DON/USMC has decided to dispose of soil excavated from Sites 8, 11, and 12 at an off-site facility, and (2) no excavated soils will be recycled at landfill Sites 2 and 17. (See e.g., RS at Item Number 1A). We recommend that DON/USMC revise the Draft ROD to memorialize its decision to dispose of all excavated soils at appropriate off-site facilities.</p>	<p>RESPONSE: The Draft Final RODs for Sites 2 and 17 and for Sites 8, 11, and 12 will be revised to memorialize the decision to dispose of excavated soils at an appropriate off-Station facility.</p>
<p><u>Issue/Concern No. 2</u></p> <p>DON/USMC reports in the Draft ROD that Sites 8, 11, and 12 are partially paved with concrete and/or asphalt. (See e.g., Draft ROD at page 1-1) We recommend that DON/USMC revise the Draft ROD to address a number of questions and concerns that may arise from this observation. For example, DON/USMC should revise the Draft ROD to address the following questions:</p> <ul style="list-style-type: none"> • Has DON/USMC tested paving material for constituents of concern? • If the paving material is contaminated, will DON/USMC remove paving material as part of remediation activities for Sites 8, 11, and 12? 	<p>RESPONSE: Site 11 is partially paved. Pavement was not sampled this site. Although the pavement at Site 11 was not sampled, it is part of the area that is planned to be excavated as part of the remedial action at that site.</p> <p>Pavement at Sites 8 and 12 will be addressed in the Draft Final ROD for those sites.</p>
<p>We also recommend that DON/USMC revise the Draft ROD to address the further characterization and management of paving materials at Sites 8, 11, and 12. More specifically, where asphalt, concrete, or other paving materials will be excavated and disposed of, DON/USMC should revise the Draft ROD to clarify that these materials will be characterized and</p>	<p>RESPONSE: The pavement that is removed from the units that will be requiring remedial action will be treated with the same level of care as the contaminated soils from these same areas, i.e., the paving materials will be characterized and disposed at an appropriate off-Station facility.</p>

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<p>disposed of at appropriate off-site facilities. Where asphalt, concrete, or other paving materials will remain at Sites 8, 11, and 12, DON/USMC should address in the ROD any sampling or confirmation sampling that will be undertaken to ensure that such materials are not contaminated and will not pose a threat to human health or the environment upon subsequent management by future owners and operators of the Site.</p>	<p>DON does not plan to leave paving materials at Site 11 following remediation.</p>
<p><u>Issue/Concern No. 3</u></p> <p>In the Draft ROD, DON/USMC states that a refuse pile and PCB-impacted soil were removed and/or excavated from Unit 3 of Site 8. (See e.g., Draft ROD at page 5-3) We recommend that DON/USMC revise the Draft ROD to address the following questions:</p> <ul style="list-style-type: none"> • Were the excavated materials disposed of on-station? If so, where is this disposal area located; and does DON/USMC plan to remedy this area as part of the remedial work conducted at Sites 8, 11, and 12? • Were the excavated materials disposed of at an off-site facility? If so, which one(s)? If so, how were the materials characterized by DON/USMC (e.g. were they characterized as hazardous waste, special waste, or nonhazardous waste)? <p>We also recommend that DON/USMC revise the Draft ROD (1) to provide information concerning these historic remediation activities, and (2) to discuss the need, if any, to conduct additional sampling and management (e.g. off-site disposal) of previously excavated soils.</p>	<p>RESPONSE: This comment does not relate to Site 11 which is the subject of the Draft Final ROD. The comment will be addressed at the time the Draft Final ROD for Sites 8 and 12 is issued.</p>
<p><u>Issue/Concern No. 4</u></p> <p>DON/USMC indicates in the RS that "cleanup levels for soil are provided in the Operable Unit (OU)-3 Feasibility Study Report and in Tables 7-1 to 7-3 of the OU-3A Sites 8, 11, and 12 ROD. These levels are based on a residential risk of 10^{-6} (one additional cancer incident in a population of one million)." (See RS, Item Number 1H) DON/USMC also indicates in the RS that "[f]ield sampling and analysis for the remedial action will be</p>	<p>RESPONSE: Thank you for your clarification. (1) The text will be revised to indicate that once the remedial action is complete at Site 11, risks will be approximately 10^{-6}. This is within the range considered allowable by the U.S. EPA. Sites 8 and 12 will be addressed in a separate ROD. (2) The level of detail for taking no action will be expanded to explain that both cancer and noncancer risks at Site 11 Unit 3 are within the range considered allowable by the U.S. EPA. (3) The comment relating to Site 12 Unit 1 will be addressed in the Draft Final ROD for Sites 8 and 12. (4) DON will also clarify that there is</p>

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<p>developed during the remedial design phase and presented in the Remedial Action Plan. Once the cleanup levels in the OU-3 ROD are attained, the residential risk level of 10^{-6} will be achieved.” (See RS, Item Number 11)</p> <p>Similarly, in the Draft ROD, DON/USMC states that “Alternative 3 [the selected remedy] will remove contaminated soil from Sites 8, 11, and 12, resulting in risk reduction to a level of 1×10^{-6} or less in excess cancer risks under the residential scenario. Because wastes will not be left in place and risks will be within the range considered acceptable by U.S. EPA, the 5-year review requirement of CERCLA Section 121(c) is not applicable following implementation of this alternative.” (See Draft ROD at 10-8).</p> <p>A review of the Draft ROD suggests that these and other similar statements represent an overstatement of the proposed remedy that may be misleading.</p> <p>For example, contrary to the statements presented above, DON/USMC selects in the Draft ROD a remediation strategy of “no further action” at Site 8 Units 1, 2, 3, and 4, and Site 12, Units 1, 2, and 4. In some instances, this remediation strategy maintains identified excess cancer risk levels greater than 1×10^{-6} and excess noncancer risks greater than 1.0. (See, e.g., Draft ROD at Table 6-1) For a number of reasons, including those discussed elsewhere in this memorandum, we recommend, at a minimum, that DON/USMC (1) revise the text of the Draft ROD to clarify these issues, (2) revise the Draft ROD to discuss in greater detail the rationale for determining that these units do not require further action, and (3) address in greater detail the decision to take no further action at Site 12 Unit 1 because certain pesticides were present in “only one sample” and because PAHs, pesticides, PCBs, and metals are confined to the uppermost</p>	<p>no need to conduct periodic 5-year reviews because hazardous substances will not remain at the sites at concentrations above risk-based health levels. This was stated on page 2 of the Draft ROD but will be repeated in Section 9 of the Draft Final ROD.</p>

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<p>soils and are “not mobile” (see Draft ROD at Table 6-2). In addition, DON/USMC should clarify why there is no need to conduct a five-year review pursuant to CERCLA Section 121(c) at these units.</p>	
<p>Moreover, in light of the apparently small volumes of soils at issue, GeoSyntec recommends that DON/USMC consider revising the proposed remedies to implement Alternative 3 (excavation and off-site disposal of contaminated soils) at Site 8 Units 2 and 3 and Site 12 Units 1, 2, and 4 be undertaken with the goal of achieving post-remediation excess cancer risks less than 1.0×10^{-6} and excess noncancer risks less than 1.0. Such a remediation decision may, in the long term, prove cost effective and result in greater acceptance by regulatory agencies and the public.</p>	<p>RESPONSE: This comment does not relate to Site 11 which is the subject of the Draft Final ROD. The comment will be addressed at the time the Draft Final ROD for Sites 8 and 12 is issued.</p>
<p>In addition, for units to be remediated, concerns arise with respect to DON/USMC’s consideration of combined chemical exposures. If, for example, the individual clean-up levels for each chemical of potential concern at Sites 8, 11, and 12 were developed with the goal of establishing an excess cancer risk of 1×10^{-6} and an excess noncancer risk of 1.0, the presence of more than one chemical of potential concern at a post-remediation concentration at or near its established clean-up level, nonetheless, could produce combined cancer and noncancer risks in excess of the goals established by DON/USMC. It is unclear from the Draft ROD whether DON/USMC considered this issue in establishing clean-up levels and in its remedy selection process. We recommend that DON/USMC address and clarify this issue of excess cancer and noncancer risks associated with the combination of chemicals of potential concern at each site.</p>	<p>RESPONSE: DON is aware that the magnitude of risks posed by multiple chemicals of concern can be cumulative. The cleanup level for chemicals of concern at each unit being remediated is based on an excess cancer risk of 10^{-6} and a noncancer hazard index of 1 to allow for the cumulative impact of the chemicals present at Site 11. This issue has been clarified in Section 7 of the Draft Final ROD.</p>
<p><u>Issue/Concern No. 5</u></p> <p>DON/USMC also indicates, in some portions of the Draft ROD, that arsenic and manganese detected at Site 8 Unit 2, 3, (and, possibly, 5) and at Site 12 Units 1, 2, and 4 appear to be related to natural conditions and occur naturally in native soil on and off MCAS El Toro property. On the</p>	<p>RESPONSE: This comment does not relate to Site 11 which is the subject of the Draft Final ROD. DON will respond to this comment at the time the Draft Final ROD for Sites 8 and 11 is issued.</p>

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<p>basis of this data, DON/USMC apparently concludes that these chemical concentrations are not associated with site-related activities. (See, e.g., Draft ROD 6-9, 6-10, 6-11, and Table 6-2)</p> <p>DON/USMC's statements that elevated concentrations of arsenic and manganese are not associated with "site-related activities" is not persuasive. For example, DON/USMC reports in the Draft ROD that "TAL metals" at the units noted above exceeded background levels. Arsenic and manganese are included in the TAL metals analyzed by DON/USMC at these units. (See, e.g., Draft ROD, 5-3, and 5-7, and Tables 5-1, 5-2, 5-5, and 5-6) DON/USMC does not appear to explain in the Draft ROD why "TAL metals" occurring in excess of background levels — including, presumably, arsenic and manganese — are not indicative of contamination resulting from site-related activities by DON/USMC or other historic owners and operators of the sites.</p> <p>Moreover, we note that, contrary to DON/USMC statements, elevated concentrations of arsenic and manganese at these units reasonably may be attributed to "site-related activities." We note, for example, that arsenic is component of metal alloys and rodenticides; and manganese is component of many paints, varnishes, and hardeners.</p> <p>At a minimum, we recommend that DON/USMC reconsider and re-evaluate the issue of whether arsenic and manganese detected in the relevant units are associated with site-related activities. We further recommend that DON/USMC change its proposed remedy of "no further action" at Site 8 Units 2 and 3 (and, possibly 5) and Site 12 Units 1, 2, and 4. As noted above, DON/USMC should consider implementing Alternative 3 at these units to ensure that excess cancer and noncancer risks are reduced to an acceptable level.</p>	
<p>In the alternative, if DON/USMC proposes, and regulatory agencies approve, remediation strategies that maintain or result in excess cancer risks in excess of 1×10^{-6} and excess noncancer risks in excess of 1.0,</p>	<p>RESPONSE: As stated in the Declaration and in Section 9 of the Draft Final ROD, once the remedial actions are complete, Site 11 will be released for unrestricted use. There will be no restrictions on excavation, relocation of soil,</p>

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<p>DON/USMC should revise the Draft ROD to identify and discuss the potential responsibilities and liabilities which future owners and operators would have with respect to the conduct of future activities at the sites. For example, it is reasonable and prudent to assume that the anticipated future uses of the sites will involve, from time to time, the disturbance of soils (e.g. the excavation and relocation or disposal of soils). Would such activities conflict with the remedy selected by DON/USMC and presented in the Draft ROD? Would such activities be deemed to involve the management of “clean” soils or “contaminated” soils? Would such activities require the special management of soils at incremental, additional costs to future site owners and operators? Would such activities require special management of the soils (e.g. as “hazardous waste” or as “special waste”)? These and related issues should be clarified in the Draft ROD and discussed with regulatory agencies prior to the finalization of the remedy selection process.</p>	<p>or specific provisions for management of the excavated soil.</p>
<p><u>Issue/Concern No. 6</u></p> <p>In May 1999, DON/USMC issued a document titled “Draft Historical Radiological Assessment Marine Corps Air Station, El Toro” (Draft HRA) prepared by Supervisor of Shipbuilding, Portsmouth, Virginia, Environmental Detachment, Vallejo, California for Naval Sea Systems Command Detachment, Radiological Affairs Support Office and Naval Facilities Engineering Commend, Southwest Division. The Draft HRA identifies areas at MCAS El Toro potentially impacted by radiological materials. By letter dated June 21, 1999, the LRA submitted to DON/USMC comments and questions prepared by GeoSyntec concerning the Draft HRA. These comments are incorporated by reference in this memorandum. To date, the LRA has not received any response from DON/USMC to the comments and concerns regarding the Draft HRA. GeoSyntec recommends that DON/USMC address the June 21, 1999 submittal, and the issues set forth below, prior to finalizing the ROD for Sites 8, 11, and 12.</p>	<p>RESPONSE: DON has received the LRA’s comments on the Draft HRA submitted by letter dated June 21, 1999 and is responding to these comments under separate cover.</p>

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<p>The authors of the Draft HRA note that radioactive materials may have been stored or handled at Site 8 at MCAS El Toro (Site 8 is also called DRMO Yard #1). (See, e.g., Draft HRA at 49) Site 12 may also have been impacted by radioactive material. This site was the location of a treatment plant that received waste liquids originating from Buildings 295, 296, and 297, which contained radioactive material. (See, e.g., Draft ROD Table 1.1) In consideration of the above, we recommend that DON/USMC consider and comment upon the following questions and concerns:</p>	<ul style="list-style-type: none"> • RESPONSE: The comments on the LRA's particular concerns follow.
<ul style="list-style-type: none"> • The authors of the Draft HRA recommend further radiological investigations at MCAS El Toro. Have these investigations already been conducted? If so, do they confirm the findings presented in the Draft HRA? Does DON/USMC intend to conduct or authorize such investigations? Will the investigations include Sites 8 and 12? If so, on what schedule will the investigations be undertaken? 	<ul style="list-style-type: none"> • RESPONSE: Once the HRA is completed, DON intends to conduct further radiological investigations as recommended in the HRA. These investigations will include Sites 8 and 12. DON is currently making arrangements to conduct the investigations, and a project schedule will be forwarded to the LRA as soon as it is established.
<ul style="list-style-type: none"> • Should additional investigations indicate that radioactive materials are present at Site 8 or 12, what would be the impact of the presence of these radioactive materials on the remedy selected by DON/USMC for Site 8 or 12? On the proposed post-remediation reuse of these sites? 	<ul style="list-style-type: none"> • RESPONSE: Once the survey data have been collected and analyzed, DON will evaluate the impact of any radioactive materials found to be present at Sites 8 and/or 12. Should the survey conclude that radioactive contamination is present at Sites 8 and/or 12, DON will revise the risk assessment as necessary to document any additional risk and will evaluate the potential impact on the remedial alternative selected for the sites. The results of the radiological survey and the evaluation will be summarized in the Draft Final ROD for Sites 8 and 12.
<ul style="list-style-type: none"> • The Draft HRA addresses groundwater pathways. Has DON/USMC considered the transport of radioactive materials and contaminants from Site 8 or 12 to the groundwater? Does DON/USMC have any information or expect to receive any information about the ability of the soils beneath Site 8 or 12 to attenuate or impede the migration of radioactive materials and contaminants from the landfills to the groundwater? 	<ul style="list-style-type: none"> • RESPONSE: DON has not conducted specific site studies to evaluate the transport of radionuclides through the soils underlying Sites 8 or 12 because it has not been established that there has been a release of radioactive materials at these sites. Should the radiological survey show that such a release has occurred, DON will evaluate the need to perform transport studies at that time.
<ul style="list-style-type: none"> • U.S. Nuclear Regulatory Commission procedures for closing a site at 	<ul style="list-style-type: none"> • RESPONSE: DON will evaluate the need for a radiological performance

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<p>which there may be radioactive constituents require, in part, the development of a radiological performance assessment. Has DON/USMC conducted such a performance assessment at Site 8 or 12? Is one planned for Site 8 or 12? If so, what is the schedule for the completion of such a performance assessment?</p>	<p>assessment once the radiological survey has been completed and the results have been evaluated.</p>
<p>CONCLUSIONS</p> <p>As noted above, GeoSyntec recommends, at a minimum, that the ROD not be finalized until DON/USMC responds to the comments listed herein regarding the Draft ROD. Indeed, GeoSyntec notes that the Department of Toxic Substance Control (DTSC) is not prepared to approve the Draft ROD for Sites 3 and 5 until issues similar to those raised in this memorandum are addressed to DTSC's satisfaction. The same course of action is warranted with respect to Sites 8, and 12.</p>	<p>RESPONSE: DON is pleased to respond to the LRA's comments on the Site 8, 11, and 12 ROD prior to finalization. These responses to the LRA's comments will accompany the Draft Final ROD for Site 11 that is scheduled to be issued in September 1999 and the Draft Final ROD for Site 8 and 12. A date for issuing the Draft Final ROD for Sites 8 and 12 has not yet been established.</p>

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September 1999

<p>Originator: Tayseer Mahmoud, RPM DTSC</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: 2 August 1999</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0164 File Code: 0222</p>
<p><u>GENERAL COMMENTS</u> The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated June 1999 and the Responsiveness Summary (RS) dated July 20, 1999. The draft ROD presents the selected remedial action for soil contamination at Site 8, Defense Utilization and Marketing Office Storage Area, Site 11, Transformer Storage Area, and Site 12, Sludge-Drying Beds. DTSC comments are as follows:</p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p>
<p>1. Description of the Remedy, page 1 & 2 – The ROD states that the Marine Corp’s preferred remedy for the subject sites involves excavating the contaminated soil and recycling soil as foundation material for landfill caps at Site 2 & 17. However, based on the RS the excavated contaminated soil will be disposed at an appropriate off-Station facility. Please revise the description of the remedy accordingly.</p>	<p>RESPONSE 1: The Department of the Navy (DON) has decided to dispose of contaminated soil from Sites 8, 11, and 12 off-Station rather than recycle the soil at the Site 2 or 17 landfills. The description of the remedy has been revised to reflect this decision. DON has also decided to remove Sites 8 and 12 from the Draft Final ROD. This decision was made to allow DON to perform a radiological survey of these sites, analyze the survey results, and evaluate the impact on the proposed remedial alternative if radioactive materials are found to be present at either site.</p>
<p>2. Section 5.1, Summary of Site Characteristics, Site 8 – The regulatory agencies received copies of the draft Historical Radiological Assessment (HRA) dated May 1999. The HRA proposes further investigation/radiological survey of Site 8. Please document, in this ROD, the recommendations of the HRA and how the conclusions and the outcome of the field work will be documented.</p>	<p>RESPONSE 2: DON has revised Section 2 of the Draft Final Site 11 ROD to address the HRA and to note that the HRA did not recommend action at Site 11. The HRA report has also been added to the list of references in Section 12.</p> <p>The HRA recommended radiological surveys of Sites 8 and 12. Because it was not possible to complete the surveys before the Draft Final ROD for Site 8, 11, and 12 was due, DON has removed Sites 8 and 12 from the ROD. As noted in the response to comment 1, this decision was made to allow DON to perform a radiological survey of both sites, analyze the survey results, and evaluate the impact on the proposed remedial alternative in the event that radioactive materials are found to be present at either site.</p> <p>DON is in the process of arranging for the radiological survey/sampling of Sites 8 and 12. The conclusions and outcome of the field investigation will be</p>

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DRAFT RECORD OF DECISION
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<p>Originator: Tayseer Mahmoud, RPM DTSC</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: 2 August 1999</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0164 File Code: 0222</p>
	<p>presented in a report that will be submitted to the FFA signatories for review. The results of the radiological investigation will also be summarized in the Draft Final ROD for Sites 8 and 12.</p>
<p>3. Section 5.3, Summary of Site Characteristics, Site 12 – Table 5-1 of the HRA mentions that it is possible that radium paint room waste could have been disposed of into the industrial wastewater system through an independent sewer system installed to collect metal plating waste. Therefore, there is a potential for radiological contamination at Site 12, the Sludge Drying Beds. Please address the concern regarding radioactivity at Site 12 and whether or not you plan to conduct further investigation/radiological survey of Site 12. If no investigation is planned, please submit the reason(s) and your justification.</p>	<p>RESPONSE 3: DON concurs with your recommendations for further investigation/radiological survey of Site 12 and plans to include this site in the radiological investigation.</p>
<p>4. Section 6, Summary of Site Risks. An evaluation of the potential impacts to human health and the environment if radioactive contamination is found at Sites 8 and 12 is not included in this section. Please indicate in the ROD the mechanism that will be used to document any additional risk and how it will impact the proposed disposal options.</p>	<p>RESPONSE 4: DTSC is correct. An evaluation of the potential radiological risks to human health and the environment was not included in the Draft ROD because the potential for radioactive material at these sites was not known until the Draft HRA was issued. DON has completed its review of the Draft HRA and has decided to remove Sites 8 and 12 from the Draft Final ROD pending the results of the radiological survey.</p> <p>Should the survey conclude that radioactive materials are present above background at Sites 8 and/or 12, DON will revise the risk assessment as necessary to document the additional risk and will evaluate the potential impact on the remedial alternatives selected for the sites. DON would document the additional risk and evaluation of the impact on the remedy by means of an addendum to the OU-3A feasibility study report or in a separate report. The Draft Final ROD for Sites 8 and 12 will summarize the results of the radiological investigation, document changes in risk, and evaluate the impact on the proposed remedy.</p>
<p>5. Section 7.3, Alternative 3, Excavation with Recycling of Excavated Soil at Sites 2 or 17 Landfills – Please delete reference to recycling</p>	<p>RESPONSE 5: The reference to recycling the excavated contaminated soil at the landfill sites has been deleted and the text has been clarified to indicate that</p>

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<p>the excavated contaminated soil at the landfill sites. Also, indicate the disposal option if radioactivity contamination is found at the sites.</p>	<p>contaminated soil from Sites 8, 11, and 12 will be disposed off-Station. If radiological contamination is found at Site 8 or Site 12, DON will evaluate the magnitude of the risk, the type of contamination (e.g., discrete, diffuse), and will evaluate the impact on the proposed remedy based on these parameters. As noted in the response to comment 4, the results of the survey and the evaluation will be summarized in the Draft Final ROD for Sites 8 and 12.</p>
<p>6. Section 11, Documentation of Significant Changes – Please revise this section based on the comments received during the public comment period and the changes proposed for the remedy.</p>	<p>RESPONSE 6: Section 11 has been revised to indicate that DON has decided to dispose of the contaminated soil from Sites 8, 11, and 12 off-Station rather than recycling the soil at the Sites 2 and 17 landfills and to indicate that Sites 8 and 12 are no longer being addressed in the Draft Final ROD.</p>

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September 1999

<p>Originator: Thelma K. Estrada U.S. EPA</p> <p>To: Glenn Kistner RPM U.S. EPA</p> <p>Date: 12 August 1999</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0164 File Code: 02221</p>
<p><u>GENERAL COMMENTS</u></p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p>
<p>1. Overall, the quality of the document is excellent. It's well-written and easy to understand by a non-technical person.</p>	<p>RESPONSE 1: Comment noted. Thank you.</p>
<p>2. Page 2: In describing the preferred remedy, DON should clarify the steps following excavation, i.e., contaminated soil will be evaluated to see if it meets the criteria for use as foundation material for landfill caps at the two on-Station landfills ("acceptance criteria"); if it doesn't, the contaminated soil will be disposed at an appropriate off-Station facility. The parenthetical statement that DON <u>may</u> choose to dispose contaminated soil at an off-Station facility should be deleted.</p>	<p>RESPONSE 2: Since the Draft Site 8, 11, 12 ROD was issued, DON has decided to dispose of contaminated soil from Sites 8, 11, and 12 off-Station rather than recycle the soil at the Site 2 or Site 17 landfills. The description of the preferred remedy has been revised accordingly.</p>
<p>3. Pp 5-1 through 5-8 (Summary of Site Characteristics): In this section, there should be a brief description of each unit, e.g., Unit 5 is an old salvage yard. Sometimes, there is such a description ("Unit 3 is the former location of a refuse pile.") but this is not done consistently. A short description of the site is helpful in understanding the history of the contamination at the site.</p>	<p>RESPONSE 3: A description of each unit has been added to Pages 5-1 through 5-8 as requested. It should be noted, however, that DON has decided to remove Sites 8 and 12 from the Draft Final ROD. This decision was made to allow time to perform a radiological survey of these sites and evaluate the impact of the data on the remedial alternative for these sites. A separate ROD will be issued for Sites 8 and 12. A description of the Site 8 and 12 units will be included in the Draft Final ROD for those sites.</p>
<p>4. P. 5-5: The discussion for Units 1 and 2 should conclude with a statement similar to that in Units 2, 3, and 5 for Site 8, i.e., "This ROD presents the remedial action selected for this area."</p>	<p>RESPONSE 4: The suggested conclusion has been added to the discussion for Site 11 Units 1 and 2 as requested.</p>
<p>5. P. 5-7: After describing the contamination at Units 2 and 4, there should be concluding statement that states something like "Nevertheless, these units are recommended for No Further Action because...."</p>	<p>RESPONSE 5: The statement will be added to the Draft Final ROD for Sites 8 and 12.</p>

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<p>6. Pp. 5-13 through 5-42: The Notes following the Tables should explain what the shaded areas represent.</p>	<p>RESPONSE 6: An explanation has been added to the notes following the tables to explain that the chemicals that are shaded represent chemicals that are risk drivers.</p>
<p>7. Pp. 6-7, 6-8: This is an excellent Table. A quick glance at this Table gives the reader a summary of the risks and recommended actions for the sites.</p>	<p>RESPONSE 7: Comment noted. Thank you.</p>
<p>8. Pp. 6-8, 6-9: Glenn - is EPA fine with the recommended NFA for Units 1, 2, and 4 at Site 12, based on the reasons articulated by DON?</p>	<p>RESPONSE 8: This is an internal question to be answered by the U.S. EPA.</p>
<p>9. P. 6-10: The last sentence for the section discussing Unit 3 is awkward and confusing. What do we mean by "Because not all the PCB-contaminated soil was removed from Unit 3 and concentrations of total PCBs contained in the soil previously removed from Unit 3, a remedial action is necessary...?"</p>	<p>RESPONSE 9: This comment refers to Site 8 and will be addressed in the Draft Final ROD for that site.</p>
<p>10. P. 6-10: After reading the site risks at Unit 5, the reader is left with the following question: Why is a remedial action necessary for this unit? We need an explanation here similar to that on the next page for Unit 3 ("This Rod selects remedial action for Unit 3 because of the).</p>	<p>RESPONSE 10: This comment refers to Site 8 and will be addressed in the Draft Final ROD for that site.</p>
<p>11. P. 7-3: Delete the paragraph discussing the transferee's liability for cost of any additional remedial action. EPA does not agree with this statement. Under CERCLA, DON cannot shift liability to the transferee. The agreement between DON and the transferee as to the consequence of any violation by transferee of any restrictive covenants should be addressed in the transfer document.</p>	<p>RESPONSE 11: The paragraph discussing liability has been deleted from the ROD. There are no restrictive covenants proposed for Site 11.</p>
<p>12. Pp. 7-4, 7-5: See my comment 2 above regarding making it clear what the steps are following excavation. We need to clarify here what are the "acceptance criteria" for Landfills 2 and 17. In other words, the excavated soils from OU3A have to meet this acceptance criteria</p>	<p>RESPONSE 12: Please see the response to Comment 2 above. DON has modified the selected remedy for Sites 8, 11, and 12. Contaminated soil from Sites 8, 11, and 12 will be disposed of at an appropriate off-Station disposal facility rather than at the Site 2 or Site 17 landfills.</p>

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<p>before they can be sent to these landfills. Otherwise, the soils will be disposed off-site at the appropriate facility. Also, this alternative involves stockpiling, albeit temporarily, following excavation. Are LDRs triggered? If the answer is no, explain why not, i.e., no placement, the stockpiling area is part of the AOC, etc.. If yes, do we do a temporary CAMU? These should also be included in the ARARs discussion.</p>	<p>DON is planning to manage excavated soil in compliance with 22 CCR 66262.34, storing the contaminated soil in containers or bins in accordance with this regulation. LDRs will not be triggered because soil will not be "placed" outside of the area of contamination.</p> <p>A discussion of land disposal restrictions has been added to pages 7-4 and 7-5 and to Section 10, Statutory Determinations.</p>
<p>13. Pp. 7-10, 7-11: The heading for this section and the discussion includes Unit 5 in the list of units that will be subject to on-site incineration; I thought Unit 5 soil will be treated using thermal desorption/thermal oxidation. Also, it should be made clear in the text here that ARARs for on-site incineration include the RCRA requirements for incinerators (either because they are applicable or relevant and appropriate) and that the thermal oxidation unit (which I gather is part of the thermal desorption treatment for Unit 5) will also comply with RCRA regulations for combustion of waste (again, either because they are applicable or relevant and appropriate). This alternative also includes a provision for stockpiling the treated soil. See my comment above regarding ARARs for stockpiling.</p>	<p>RESPONSE 13: The heading and text have been revised to delete reference to thermal desorption/oxidation because these processes are not applicable for the remedial action being taken at Site 11.</p> <p>The text has been expanded to clarify that the ARARs for onsite incineration include the RCRA requirements for incinerators. ARARs for the thermal oxidation unit will be addressed in the ROD for Sites 8 and 12.</p> <p>Please see the response to comment 12 regarding ARARs for stockpiling.</p>
<p>14. Pp. 8-2 through 8-4: Again, the description of Alternative 3 should state that the soil will either be recycled as cover material or be disposed offsite. Delete the rows "overall protection of human health and the environment" and "compliance with ARARs." These are threshold criteria that must be met and therefore not relevant to a comparison of alternatives; the Notes following the Table do state that "rating is not appropriate for threshold criteria" but having these criteria in the Table gives the impression that they are part of the comparative analysis. My suggestion is to keep the Notes and elaborate on the point that all the alternatives being considered (except for the no-action alternative) meet these threshold criteria. In the "Implementability" row, there is a statement that alternative 4</p>	<p>RESPONSE 14: The evaluation of Alternative 3 has been revised to reflect DON's decision that contaminated soil from Sites 8, 11, and 12 will be disposed of off-Station at an appropriate disposal facility.</p> <p>The rows "overall protection of human health and the environment" and "compliance with ARARs" have been deleted as requested and the footnote has been revised as suggested.</p> <p>The reference to permitting associated with Alternative 4 has been deleted as suggested.</p>

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<p>will require pilot testing, permitting and public approval. Usually, permits are not required for onsite remedial actions; however, I believe what is being referred to here is the permit from the POTW (discharge to a POTW is considered an offsite activity). This is too complicated to explain in this Table so I suggest we delete reference to the permit here since it is discussed elsewhere in the text.</p>	
<p>15. Pp. 8-6: In the paragraph discussing alternative 3 (and several times in the text of the draft ROD), mention is made of the DTSC memorandum regarding management of soil used in a manner constituting disposal as a TBC. Why is it necessary to consider this TBC? Isn't the action of using the excavated soil as foundation for landfill caps covered by a RCRA or Water Board regulation? Once the DON commits to a TBC in a ROD, it should be discussed under "Additional Performance Standards."</p>	<p>RESPONSE 15: DON did not identify a RCRA or Water Board regulation that specifically addressed recycling of excavated soil as foundation for landfill caps. Therefore, the DTSC memorandum was cited as TBC in the Draft ROD. Since DON no longer intends to recycle excavated soil as foundation material for the caps, reference to this regulation has been deleted from the Draft Final ROD.</p>
<p>16. Pp. 8-6: Please review the paragraph discussing alternative 4 in light of my comment above regarding ARARs that are applicable or relevant and appropriate to incineration, thermal oxidation, and LDRs.</p>	<p>RESPONSE 16: The Draft Final ROD has been revised to note that Alternative 4 will comply with ARARs for incineration. ARARs associated with thermal oxidation will be addressed in the ROD for Sites 8 and 12. The ROD also states that the excavation of contaminated soil for Alternative 4 will comply with the ARARs identified for Alternative 3. In the Draft Final ROD, a discussion of LDRs has been added to the paragraph discussing Alternative 3; therefore, LDRs are now addressed for Alternative 4 by reference.</p>
<p>17. P. 8-7: First paragraph under section on "Reduction of TMV" - delete the word "appreciable" in the second sentence. There is NO reduction in contaminant toxicity, mobility, or volume under alternative 1 (no action).</p>	<p>RESPONSE 17: The word "appreciable" has been deleted as suggested.</p>
<p>18. P. 8-8: Last line on this page - risks associated with incineration residuals will be mitigated by shipping these offsite to the appropriate facility.</p>	<p>RESPONSE 18: Page 8-8 has been revised to note that risks associated with incineration residuals will be mitigated by shipping these offsite to an appropriate facility.</p>

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<p>19. P. 8-9: Last line on this page - include RCRA regulations that apply to incinerators as well as RCRA/AIR regulations that apply to combustion of waste to the list here.</p>	<p>RESPONSE 19: A reference to RCRA regulations applying to incinerators and combustion of waste has been added to the discussion on Page 8-9. RCRA regulations applying to thermal desorption units will be addressed in the Draft Final ROD for Sites 8 and 12.</p>
<p>20. P. 9-1: First bullet: delete the phrase "compliance with ARARs and overall protection of HHE here and move it to the text. The text will then read: "Based on the information available at this time, the DON believes this alternative meets the threshold criteria of overall protection of human health and the environment and complies with ARARs and it also offers:"</p>	<p>RESPONSE 20: The phrase "compliance with ARARs and overall protection of HHE" has been moved as requested.</p>
<p>21. P. 9-3: First line on this page: what will the DON's discretion be based on? Why would preremediation confirmatory sampling be considered to "optimize the excavation effort."</p>	<p>RESPONSE 21: This sentence has been removed from the Draft Final ROD. Any additional sampling that DON feels is necessary to optimize the remediation of the site will be addressed during the remedial design phase.</p>
<p>22. P. 9-3: Fourth paragraph: again, please spell out the steps before the excavated soil will be recycled as foundation material for landfill caps, i.e., testing to see whether it meets the acceptance criteria at these on station landfills. This paragraph also gives the impression that we don't know yet whether the capping remedy will be chosen for these landfills. Is this true? Last sentence in this paragraph is awkward.</p>	<p>RESPONSE 22: The paragraph has been revised to indicate that contaminated soil will not be recycled to the MCAS El Toro landfills, but will be disposed off-Station at an appropriate disposal facility. The last sentence has been removed as part of the revision.</p>
<p>23. P. 9-3: Second to the last paragraph: see my comment above regarding use of DTSC's Memorandum as TBC. Also, there is a statement that the excavated soils will be stockpiled "at the sites." What sites - Sites 8, 11, and 12, or the on station landfills? Also, please incorporate here my comments regarding ARARs for stockpiling, CAMUs, i.e., whether these ARARs will apply to the</p>	<p>RESPONSE 23: Please see the above response regarding use of the DTSC memorandum as TBC. Reference to this memorandum has been removed from Section 9 since recycling of contaminated soil into the landfills is no longer part of the selected remedy.</p> <p>The discussion on page 9-3 has been expanded to note that soils being excavated from Site 11 will be handled in accordance with 22 CCR 66264.34.</p>

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<p>activities planned for the selected remedy.</p>	<p>This will not trigger land disposal restrictions or require a CAMU because the soil is not being "placed" outside of the area of contamination. Storage of soils at sites 8 and 12 will be addressed in a separate ROD.</p>
<p>24. P. 10-1: First paragraph following the bullets: add the phrase "or disposed at an appropriate offsite facility" following landfills.</p>	<p>RESPONSE 24: The first paragraph has been revised to indicate that the contaminated soil will be disposed at an appropriate off-Station facility. The reference to disposal at the on-Station landfills has been deleted.</p>
<p>25. P. 10-1, 10-2: Delete the sentences here pertaining to TBCs.</p>	<p>RESPONSE 25: The sentences pertaining to the TBCs have been deleted.</p>
<p>26. P. 10-2: Under Federal: second sentence - the word "regulations" needs to be added following "federal." Also, in the last sentence here add "storage, disposal" following the word "accumulation." Under State: this only refers to State of CA regulations pertaining to identification of non-RCRA hazardous waste. What about requirements for accumulation, storage, disposal?</p>	<p>RESPONSE 26: Under Federal, the word "regulations" has been added following "federal." Also, in the last sentence, the words "storage, and disposal" have been added following accumulation.</p> <p>The following sentence has been added under State: "If, based on the above determination, wastes are determined to be non-RCRA hazardous waste, hazardous waste accumulation, storage, and disposal requirements would be applicable."</p>
<p>27. P. 10-4: Under Federal: states that the excavated waste will be accumulated. Where? Again, incorporate here my comment regarding the applicability of ARARs for stockpiling, CAMUs.</p>	<p>RESPONSE 27: Under Federal, the sentence has been revised to state that excavated waste will be accumulated onsite in accordance with 22 CCR 66262.34.</p>
<p>28. P. 10-4: See my comment above regarding the appropriateness of having DTSC's Memorandum as a TBC.</p>	<p>RESPONSE 28: DTSC's memorandum has been deleted as a TBC because DON is no longer considering the option of recycling contaminated soil from Sites 8, 11, and 12 at the landfills.</p>
<p>29. P.10-5: Why are some RCRA regulations "applicable" while others are "relevant and appropriate." This needs to be explained in the "Comments" column.</p>	<p>RESPONSE 29: An explanation of why some regulations are applicable while others are relevant and appropriate has been added to the text in Section 10.2.3.1.</p> <p>Specifically, regulations in 22 CCR 66264. 111, 22 CCR 66264.172-175, and 22 CCR 66264.178 are relevant and appropriate because 22 CCR 66264.1 states that the requirements of the chapter including these regulations [Chapter 14] do not apply to "a generator accumulating waste on-site in compliance with</p>

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	<p>Section 66262.34 of this division.” Since DON will be accumulating waste on-site in compliance with Section 66262.34, the remaining portions of Chapter 14 are not applicable, but are “relevant and appropriate.”</p>
<p>30. P. 10-7: Last two sentences under “Utilization of Permanent Solutions etc.” - why are these relevant in this section? Under “Statutory Preference for Treatment” - include the phrase “or will be disposed at an appropriate offsite facility.” following “recycled as landfill cover material.”</p>	<p>RESPONSE 30: The last 2 sentence under “Utilization of Permanent Solutions ...” are not relevant to this section and have been removed.</p> <p>The first paragraph under “Statutory Preference for Treatment” has been revised to indicate that DON will be disposing of excavated soil off-Station.</p>

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<p>Originator: Patricia A. Hannon CRWQCB</p> <p>To: Dean Gould SWDIV</p> <p>Date: 19 August 1999</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0164 File Code: 02221</p>
<p><u>GENERAL COMMENTS</u></p> <p><u>Page 1, Declaration, Description of Remedy</u></p> <p>“No further action is recommended at Site 8 (units 1, 2, 3, and 4) Site 11 (unit 3) and Site 12 (units 1, 2, and 4) because the concentration of contaminants in soil are low and risks to human health are within the range considered generally acceptable by U. S. EPA.”</p> <p>Please explain whether or not evaluations were made to determine if the concentration of contaminants pose a risk to groundwater and what these evaluations consisted of.</p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p> <p>RESPONSE: The fate and transport evaluation performed during the remedial investigation of these sites concluded that contaminants present in soil do not present a risk to groundwater at these sites because of the low net infiltration at the sites, the low water solubility of these contaminants, and the tendency of the contaminants to adsorb to the soil and remain relatively immobile. This was supported by analytical data that showed that chemicals of concern at Sites 8, 11, and 12 are confined to shallow soil (0 to 10 feet bgs). A discussion of the fate and transport evaluation has been added to Section 5 of the ROD.</p>
<p><u>Page 1-13, 2nd paragraph</u></p> <p>According to the Water Quality Control Plan, Santa Ana River Basin, El Toro MCAS is situated over the Irvine Pressure Groundwater Subbasin.</p>	<p>RESPONSE: The second paragraph has been revised to correctly refer to the Irvine Pressure Groundwater Subbasin.</p>
<p><u>Page 5-11, Figure 5-3, Analytes Identified in Phase I and Phase II Soil Samples, Site 12 - Sludge Drying Beds</u></p> <p>We request that different colors be used to signify the locations of where SVOCs/PAH and pesticides were detected. On the figure, the colors are the same for the two groups of chemicals.</p>	<p>RESPONSE: Figure 5-3 has been deleted from the Draft Final ROD because Sites 8 and 12 have been removed from this ROD pending the evaluation of a radiological survey at these sites. The figure will be revised as requested when the Site 8 and 12 ROD is issued at a later date.</p>

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MCAS EL TORO, CALIFORNIA**

<p>Originator: Patricia A. Hannon CRWQCB</p> <p>To: Dean Gould SWDIV</p> <p>Date: 19 August 1999</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0164 File Code: 02221</p>
<p><u>Section 6, Summary of Risks</u></p> <p>Same as our first comment. This section should also discuss whether or not these sites have had an impact on surface or groundwater and if there are any impact, how the selected remedy will address them.</p>	<p>RESPONSE: A discussion of the migration pathways for contaminated soil at Sites 11 has been added to Section 5 and is summarized below. Migration pathways for contaminated soil at Sites 8 and 12 will be addressed in a separate ROD for these sites.</p> <p>Migration to groundwater is expected to be negligible at Site 11 because of the low net infiltration at the site and the low water solubility and the high affinity for sorption to soil of the contaminants (PCBs, pesticides). This is confirmed by analytical data that indicate that contamination is confined to the upper 10 foot soil interval.</p> <p>Surface water transport may occur at Site 11. Surface flow at Site 11 is induced only during significant rainfall events and will flow off-site via the asphalt lined drainage ditch near the south boundary or off the north side of the site into the surrounding streets. The presence of PCBs in the drainage ditch (Unit 2) is evidence that such surface water transport has apparently occurred. To prevent future off-site migration via surface water, the selected remedy at Site 11 will include excavation and off-Site disposal of contaminated soil at Unit 2.</p>
<p><u>Page 7-5, Section 7.3 Alternative 3 – Excavation With Recycling of Excavated Soil as Cover Material at the On-Station Site 2 or Site 17 Landfill</u></p> <p>The residual concentrations of chemicals in the soils after excavation should be evaluated for their potential for migrating to surface water or groundwater. An explanation should be inserted in this section as to why the selected cleanup numbers are protective of surface water and groundwater.</p> <p>We request that copies of the analytical results of the soil samples collected from the excavated soil be submitted to the Regional Board for review prior to placement of the soils on the landfills.</p>	<p>RESPONSE: As noted in the response to the last comment, migration to groundwater is not considered a significant migration pathway at Site 11.</p> <p>Following remediation, surface water will no longer be a potential migration pathway because the contaminated soil that is excavated will be replaced with clean fill.</p> <p>DON assumes that this comment is no longer applicable, because DON has decided to dispose of contaminated soil from Sites 8, 11, and 12 off-Station rather than at the Site 2 and 17 landfills. The work plan for the remediation of these sites will contain criteria for evaluation of the excavated soil prior to disposal. This work plan will be submitted to RWQCB for review prior to implementation of remedial action.</p>

**RESPONSE TO COMMENTS
DRAFT RECORD OF DECISION
OPERABLE UNIT 3A SITES 8, 11, AND 12
MCAS EL TORO, CALIFORNIA**

<p>Originator: Patricia A. Hannon CRWQCB</p> <p>To: Dean Gould SWDIV</p> <p>Date: 19 August 1999</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0164 File Code: 02221</p>
<p><u>Page 7-10, Section 7.4.1 Alternative 4</u></p> <p>Please explain how the liquids used for the soil washing will be stored and managed during the process and disposed of after the process is completed.</p>	<p>RESPONSE: The discussion of Alternative 4 has been revised to explain that liquid used for soil washing will be stored and managed in compliance with 22 CCR 66264.171-174, 175(a) and (b), and 178. Liquids are expected to be stored in above-ground tanks. Spill protection will be provided. The remediation unit will be self contained. Effluent will be discharged directly to the tank and the liquid will be recycled to the maximum extent possible. Once the remediation is complete, the residual liquid remaining at the end of the soil washing process will be tested in accordance with 22 CCR 66262.10(a) and 11 to determine if it is hazardous waste and will be disposed of at an appropriate off-Station disposal facility.</p>
<p><u>Page 7-10, Section 7.5</u></p> <p>Please see comment above.</p>	<p>RESPONSE: The discussion of Alternative 5 will be revised as noted in the last comment.</p>
<p><u>Page 9-1, Selected Remedy</u></p> <p>We understand from discussions with your staff and U.S EPA that the Navy has decided not to dispose of the excavated on the landfills but to dispose of the soil at an appropriate off-site facility. If this is true, please make appropriate changes in the ROD.</p>	<p>RESPONSE: It is true that DON has decided to dispose of contaminated soil from Sites 8, 11, and 12 off-Station. The Declaration, Section 7, and Page 9-1 have been revised to explain the change in disposal option for Site 11. Sites 8 and 12 will be addressed in a separate ROD.</p>
<p><u>Page 9-3</u></p> <p>Stockpiles of contaminated soil should be protected from the weather to prevent the soil from being transported offsite by wind or rain.</p>	<p>RESPONSE: DON plans to use containers or bins rather than stockpiles to store the small amount of contaminated soil associated with this remedial action.</p>



BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

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

Document Control No.: CTO-0164/0092

File Code: 02221

TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 02R.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA 92132-5190

DATE: September 16, 1999
CTO #: 0164
LOCATION: MCAS El Toro

FROM: Thurman L. Heironimus, Project Manager

DESCRIPTION: Response to Agency Comments - Draft Record of Decision for Operable Unit 3A - Sites 8, 11, and 12 - DTD September 1999 REF # 0072

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CLEAN II Program
Bechtel Job No. 22214
Contract No. N68711-92-D-4670
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IN REPLY REFERENCE: CTO-0164/0092

September 16, 1999

Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 02R.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA 92132-5190

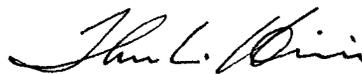
Subject: Response to Agency Comments – Draft Record of Decision for
Operable Unit 3A – Sites 8, 11, and 12 – Dated September 1999

Dear Mr. Selby:

It is our pleasure to submit the Response to Agency Comments on the Draft Record of Decision (ROD) for Operable Unit (OU) 3A – Sites 8, 11, and 12 – for the Marine Corps Air Station (MCAS) El Toro, California. This document was prepared under Contract Task Order (CTO) 0164 and Contract No. N68711-92-D-4670. The draft final ROD that incorporates these comments is sent out under separate cover and is a Federal Facility Agreement (FFA) deliverable.

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 Jane Wilzbach at (619) 744-3029, or myself at (619) 744-3004.

Sincerely,



Thurman L. Heironimus, R.G.
Project Manager

TLH/sp

Enclosure



Bechtel National, Inc. Systems Engineers-Constructors