



DEPARTMENT OF THE NAVY  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132-5190

5090  
Ser 06CC.DG/176  
March 10, 2000

Ms. Triss Chesney  
California Environmental Protection Agency  
Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, CA 90630-4700

Subj: RESPONSE TO JANUARY 04, 2000 DTSC LETTER ADDRESSING  
AERIAL PHOTOGRAPH ANOMALY (APHO) 26

Dear Ms. Chesney:

Our response to the concerns you raised in the subject letter, are provided in the enclosure. I believe in it, you will find that all of the issues have been adequately addressed.

Thank you for your time and effort in the review of this document, and for your concurrence on the "No Further Action" status. Please contact myself at (619) 532-0784, or Ms. Lynn Hornecker at (619) 532-0783, should you have any further questions on this APHO site.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dean Gould".

DEAN GOULD  
Base Realignment and Closure  
Environmental Coordinator  
By direction of the Commander

Enclosure: (1) Response to Comments on DTSC review of the October 20, 1999  
APHO 26 Report

Copy to (w/encl):

United States Environmental Protection Agency  
Hazardous Waste Management Division (SFD 8-2)  
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5090  
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March 13, 2000

Blind copy to:  
06CC.LH  
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06CC.CA  
4EN.WS  
Serial file

Writer: D. Gould, SWDIV 06CC.DG, 619-532-0784  
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RESPONSES TO COMMENTS FROM THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
 Subject: Aerial Photograph Anomaly APHO 26, Marine Corps Air Station, El Toro

Comment	Response
<p><b>Comments prepared by Ms. Triss Chesney, California Department of Toxic Substances Control (DTSC) dated 4 January 2000</b></p> <p><b>Subject: Summary Report for Aerial Photograph Anomaly APHO 26, Marine Corps Air Station (MCAS) El Toro</b></p> <p><b>Addressee: Mr. Dean Gould, Base Realignment and Closure (BRAC) Environmental Coordinator</b></p>	
<p>The Department of Toxic Substances Control (DTSC) reviewed the above report dated October 30, 1999 and received by this office on November 1, 1999. The report presents the results of the record search activities and visual inspection of APHO 26 (also referenced as Science Applications International Corporation (SAIC) 189). The anomaly was identified on an aerial photograph dated August 28, 1968 and described as an excavation with possible liquids located at the intersection of the taxiways, about 1,200 feet north of Runway 25R and 1,100 feet west of Runway 34L.</p> <p>After review of the report, DTSC has the following comments:</p>	
<p><b>Comment 1.</b>          Page 3, Table 1: Oil/water separator (OWS) 850E is included in the table; however, OWS 850E is not included in the OWS inventory listed in the March 1999 <i>Base Realignment and Closure (BRAC) Cleanup Plan (BCP)</i>. Please clarify.</p>	<p><b>Response:</b>          OWS 850E was identified following the publication of the Base Realignment and Closure (BRAC) Cleanup Plan (BCP) update of 1999. The March 2000 BRAC Business Plan includes OWS 850E on the lists of environmental locations of concern (Tables 2 and 3).</p>

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<p><b>Comment 2.</b>                      Page 3, Table 1, OWSs 850, 850E, and 851: The comment for the OWSs does not reflect the information presented in the Summary Report for APHO 39 and APHO 49, "Field sampling is planned for early 2000." Please clarify.</p>	<p><b>Response:</b>                      Table 1 in the Summary Report for APHO 26 presents a different description for future work at OWSs 850, 850E, and 851 than Table 1 in the Summary Report for APHO 39 and APHO 49.</p> <p>Table 1 (Sampling Activities at or near APHO 26) in the Summary Report for APHO 26 indicates that the underground storage tanks and the oil/water separator units (USTs 850A&amp;850B, OWSs 850, 850E, and 851) are inactive and that tank closure activities are tentatively scheduled for early calendar year 2000.</p> <p>Table 1 (Sampling Activities at or near the APHO 39/49 Vicinity) in the Summary Report for APHO 39 and APHO 49 indicates that OWSs 850, 850E, and 851 are inactive and that field sampling is planned for early 2000.</p> <p>For clarification, Table 1 in the Summary Report for APHO 26 identified a larger group of activities - tank closure activities - which includes excavation and removal of tanks or closure of the tanks in place and field sampling activities at the tank sites. The Table 1 in the Summary Report for APHO 39 and APHO 49 identified only the field sampling activities at OWSs 850, 850E, and 851. Field sampling will be conducted at OWSs 850, 850E, and 851 during the process of conducting tank closure activities.</p>
<p>The report recommends a no further action status for APHO 26 based on evaluation of field inspection results, environmental program documents, and historical property records. Evidence of recent or prior excavation activities, liquids or wet soils was not observed during the visual site inspection conducted by the Navy on October 1 and 10, 1999. Evidence of prior use of the APHO 26 area for storage of hazardous substances was not found</p>	<p>Thank you for your comments, and for reviewing the Summary Report for APHO 26.</p>

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<p>during review of environmental program documents and historical property records. Also, surface water from the APHO 26 vicinity discharges to Bee Canyon Wash. The wash was investigated as part of IRP Site 25. A Record of Decision for no action was signed for IRP Site 25 in September 1997.</p> <p>Additionally, the report recommends that the comments for APHO 26 in Table 3-2 in the BCP be revised to correlate to the description provided in the SAIC <i>Final Report, Aerial Photograph Assessment, MCAS El Toro</i> as follows: "APHO 26, identified on a 1968 photograph as SAIC 189, is described as an excavation with possible liquids near the intersection of the taxiways southwest of IRP Site 16." Based upon clarification provided by the Navy, DTSC understands that these revisions are necessary to correct previous transcription errors from the SAIC Final Report to the BCP.</p> <p>Based on review of the summary report, DTSC concurs with the proposed no further action status designation and comment revision for APHO 26. The no further action status and revised comment in Table 3-2 must be documented in the next BCP update.</p>	

## TRANSMITTAL

Date: 17 March 2000

From: Lynn Marie Hornecker *LMH*  
MCAS El Toro

To: Diane Silva Code OILS.DS  
Administrative Record

Subj: Administrative Record Materials  
Marine Corps Air Station, El Toro

*Installation: MCAS El Toro*

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*Document Title: Response to January 4, 2000 DTSC letter addressing  
aerial photograph anomaly APHO 26*

*Author: Dean Gould, SWDIV*

*Recipient: Triss Chesney, DTSC*

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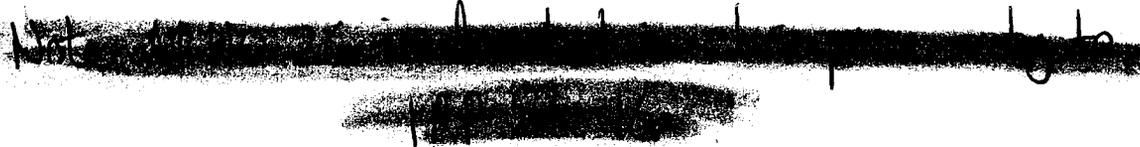
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*CTO Number: N/A*



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MCAS EL TORO  
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**COMMENTS TO THE SUMMARY REPORT FOR  
APHO 26 IS ENTERED INTO THE DATABASE  
AND FILED UNDER ADMINISTRATIVE  
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