



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

5090  
Ser 06CC.DG/104  
February 18, 2000

Ms. Patricia Hannon  
California Regional Water Quality Control Board  
Santa Ana Region  
Remedial Project Manager  
3737 Main Street, Suite 500  
Riverside, CA 92501-3339

Subj: RESPONSES TO COMMENTS ON THE DRAFT BRAC BUSINESS PLAN,  
MCAS EL TORO OF DECEMBER 1999

Dear Ms. Hannon:

Enclosed with this letter are our responses to comments on the subject document. For completeness, responses to the other BCT members, as well as the LRA are also included. Thank you very much for your input on the Business Plan, and in turn, making it a better document for all interested parties.

The actual publication of the Final Business Plan, for your signature, will follow shortly. Should you have any other comments on the Business Plan, please feel free to contact myself at (619) 532-0784, or Ms. Lynn Hornecker at (619) 532-0783.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Gould", written over a large, stylized loop.

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

Enclosure: 1. BCT Responses to Comments on December 1999 Draft Business Plan  
2. LRA Responses to Comments on December 1999 Draft Business Plan

Copy to: (w/encl)  
Mr. Glenn Kistner, U.S. EPA  
Ms. Triss Chesney, DTSC



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5090  
Ser 06CC.DG/105  
February 18, 2000

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

Subj: RESPONSES TO COMMENTS ON THE DRAFT BRAC BUSINESS PLAN,  
MCAS EL TORO OF DECEMBER 1999

Dear Ms. Chesney:

Enclosed with this letter are our responses to comments on the subject document. For completeness, responses to the other BCT members, as well as the LRA, are also included. Thank you very much for your input on the Business Plan, and in turn, making it a better document for all interested parties.

The actual publication of the Final Business Plan, for your signature, will follow shortly. Should you have any other comments on the Business Plan, please feel free to contact myself at (619) 532-0784, or Ms. Lynn Hornecker at (619) 532-0783.

Sincerely,

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

Enclosure: 1. BCT Responses to Comments on December 1999 Draft Business Plan  
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Copy to: (w/encl)  
Mr. Glenn Kistner, U.S. EPA  
Ms. Patricia Hannon, Cal RWQCB, Santa Ana Region



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1220 PACIFIC HIGHWAY  
SAN DIEGO, CALIFORNIA 92132-5190

5090  
Ser 06CC.DG/103  
February 18, 2000

Mr. Glenn R. Kistner  
U.S. Environmental Protection Agency  
Region IX, (SFD 8-2)  
Hazardous Waste Management Division  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Subj: RESPONSES TO COMMENTS ON THE DRAFT BRAC BUSINESS PLAN,  
MCAS EL TORO OF DECEMBER 1999

Dear Mr. Kistner:

Enclosed with this letter are our responses to comments on the subject document. For completeness, responses to the other BCT members, as well as the LRA, are also included. Thank you very much for your input on the Business Plan, and in turn, making it a better document for all interested parties.

The actual publication of the Final Business Plan, for your signature, will follow shortly. Should you have any other comments on the Business Plan, please feel free to contact myself at (619) 532-0784, or Ms. Lynn Hornecker at (619) 532-0783.

Sincerely,

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

Enclosure: 1. BCT Responses to Comments on December 1999 Draft Business Plan  
2. LRA Responses to Comments on December 1999 Draft Business Plan

Copy to: (w/encl)  
Ms. Triss Chesney, DTSC  
Ms. Patricia Hannon, Cal RWQCB, Santa Ana Region



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NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CALIFORNIA 92132-5190

5090  
Ser 06CC.DG/102  
February 18, 2000

Mr. Michael Lapin  
El Toro Master Development Program  
10 Civic Center Plaza, Second Floor  
Santa Ana, CA 92701

Subj: RESPONSES TO COMMENTS ON THE DRAFT BRAC BUSINESS PLAN,  
MCAS EL TORO OF DECEMBER 1999

Dear Mr. Lapin:

Enclosed with this letter are our responses to comments on the subject document. For completeness, responses to the BCT, as well as the LRA, are included. Thank you very much for your input on the Business Plan, and in turn, making it a better document for all interested parties.

The actual publication of the Final Business Plan will follow shortly. Should you have any other comments on the Business Plan, please feel free to contact myself at (619) 532-0784, or Ms. Lynn Hornecker at (619) 532-0783.

Sincerely,

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

Enclosure: 1. BCT Responses to Comments on December 1999 Draft Business Plan  
2. LRA Responses to Comments on December 1999 Draft Business Plan

RESPONSES TO COMMENTS FROM THE BRAC Cleanup Team (BCT)  
 Subject: Draft BRAC Business Plan, MCAS El Toro of December 1999

Comment	Response
<p>Comments prepared by Mr. Glenn Kistner, United States Environmental Protection Agency (USEPA) dated 18 January 2000 (transmitted via e-mail message dated 18 January 2000)</p> <p>Addressee: Mr. Dean Gould, Southwest Division Naval Facilities Engineering Command</p>	
<p>Comment 1: Page 12, #8: Change "Presumptive remedies have been considered ..." to: "Presumptive remedies have been selected for the four landfill sites ...".</p>	<p><b>Response:</b> Comment incorporated. The text of the Business Plan will be revised in accordance with the comment.</p>
<p>Comment 2: Page 14, Planned Goals for Y2K: Add: Complete Draft ROD for Sites 18 and 24.</p>	<p><b>Response:</b> Comment incorporated. The text of the planned goals section of the Business Plan will be revised in accordance with the comment.</p>
<p>Comment 3: There should probably be something added about continued community and stakeholder involvement in the CERCLA process including the post ROD phases.</p>	<p><b>Response:</b> Comment incorporated. The text of the planned goals section of the Business Plan will be revised in accordance with the comment. Thank you for reviewing the document.</p>
<p>Comments prepared by Ms. Patricia Hannon, California Regional Water Quality Control Board, Santa Ana Region dated 19 January 2000 (transmitted via e-mail message dated 19 January 2000)</p> <p>Addressee: Mr. Dean Gould, Southwest Division Naval Facilities Engineering Command</p>	
<p>Comment: We reviewed the plan and we do not have any comments.</p>	<p><b>Response:</b> Thank you for reviewing the document.</p>

RESPONSES TO COMMENTS FROM THE BRAC Cleanup Team (BCT)  
 Subject: Draft BRAC Business Plan, MCAS El Toro of December 1999

Comment	Response
<p><b>Comments prepared by Ms. Triss Chesney, California Department of Toxic Substances Control dated 24 January 2000</b></p> <p><b>Addressee: Mr. Dean Gould, Southwest Division Naval Facilities Engineering Command</b></p>	
<p><b>General Comments:</b> The Department of Toxic Substances Control (DTSC) reviewed the above report dated December 1999 and received by this office on 20 December 1999. The business plan is a condensed alternative to a BRAC Cleanup Plan (BCP) that was initially issued in 1994 and updated annually through 1999. The intent of the Business Plan is to reduce repetitive information that was presented in the BCP and provide a concise summary of the status of and strategies for the cleanup at MCAS El Toro. In general, the business plan is well organized and presents the information in a clear and concise manner.</p> <p>After review of the business plan, DTSC has the following comments:</p>	<p><b>Response:</b> Thank you for reviewing the document.</p>
<p><b>Specific Comments</b>  <b>Comment 1.</b> Page 7, Operable Unit (OU) 2A: Please include the status for Site 25 (Major Drainage(s)) to indicate that the Record of Decision (ROD) for no further action for Site 25 was signed on 30 September 1997.</p>	<p><b>Response:</b> Comment incorporated. The text will be revised to include this information.</p>
<p><b>Comment 2:</b> Page 7, OU-2B: Types of wastes associated with</p>	<p><b>Response:</b> Comment incorporated. The text will be revised to</p>

RESPONSES TO COMMENTS FROM THE BRAC Cleanup Team (BCT)  
 Subject: Draft BRAC Business Plan, MCAS El Toro of December 1999

Comment	Response
<p>Sites 2 and 17 are described as "Suspected types of wastes include construction debris, municipal-type waste from Station operations, and oils and fuels."</p> <p>DTSC recommends modification of this description to be consistent with the "Working Draft" Final ROD for Sites 2 and 17, "Suspected types of wastes include construction debris, municipal waste, batteries, waste oils, hydraulic fluids, paint residues, transformers, and waste solvents. It is also possible that equipment painted with radium paint or other low-level radiological materials consistent with Station operations could have been disposed of into the Site 2 and 17 landfills."</p>	<p>include this information.</p>
<p><b>Comment 3:</b> Page 8, OU-2B (continued), first sentence: The Draft ROD was submitted in October 1998 to the BCT for review. The Draft Final ROD is expected to be completed in the year 2000.</p> <p>The referenced ROD only addresses the remedy for soil at Sites 2 and 17 and does not include the remedy for groundwater at Site 2. Based on the "Working Draft" Final ROD, remedial action for groundwater at Site 2 will be selected in a separate ROD or by means of an amendment to this ROD. Please include this distinction in the text.</p>	<p><b>Response:</b> Comment incorporated. The text will be revised to include this information.</p>
<p><b>Comment 4:</b> Page 8, OU-3: "OU-3 addresses the remaining 7 sites that still require further investigation/action."</p> <p>In general, it would be helpful to include a comprehensive list of the sites associated with each OU and their respective status. Please provide a list of the sites that require further investigation/action and the associated status to be consistent with the information presented for the other OUs. Additionally, please list the other sites associated with OU-3 that are</p>	<p><b>Response:</b> Comment will be incorporated. The text will be revised to identify the status of the sites associated with OU-3.</p>

RESPONSES TO COMMENTS FROM THE BRAC Cleanup Team (BCT)  
 Subject: Draft BRAC Business Plan, MCAS El Toro of December 1999

Comment	Response
designated as needing no further action.	
<p><b>Comment 5:</b> Page 9, Compliance Program Sites and Other Locations of Concern (LOCs): A status of non-transformer polychlorinated biphenyl (PCB) equipment is not included in the text or tables. It would be helpful to include this information to show that this issue has been addressed.</p>	<p><b>Response:</b> Comment acknowledged. The specific information that we have available will be incorporated into the Final Business Plan.</p>
<p><b>Comment 6.</b> Page 10, Removal Actions, second paragraph: Provide a brief description (one to two sentences) of the removal actions, including the volume of material removed and whether disposal was on or off-site.</p>	<p><b>Response:</b> Comment will be incorporated. Additional clarification will be added regarding Sites 2&amp;17. For specific information on removal of underground storage tanks and remediation of tank sites however, reference should be made to the Site Assessment Reports and Closure Reports. Information pertaining to completed CERCLA removal actions is provided within the On-Scene Coordinator Reports that were submitted following completion of the field work. Closure or NFA letters pertaining to tank sites and the On-Scene Coordinator Reports are included in the CERCLA administrative record.</p>
<p><b>Comment 7.</b> Table 2, Site Summary, Sheet 1 of 33, IRP 2: The status for IRP 2 includes "Draft Record of Decision (ROD) submitted in October 1998." This status should be revised to reflect that the ROD submitted only addressed soil.</p>	<p><b>Response:</b> Comment incorporated. The table will be revised to include this information.</p>
<p><b>Comment 8:</b> Figure 2: The planning area and land use designations are difficult to read due to the small font size. Please increase font size.</p>	<p><b>Response:</b> Comment will be incorporated to the extent practicable.</p>
<p><b>Comment 9:</b> Figure 9: The red text is difficult to read as a result of the font characteristics or reproduction quality. Please change so that the text is legible.</p>	<p><b>Response:</b> Comment will be incorporated to the extent practicable.</p>

RESPONSES TO COMMENTS FROM THE MCAS EL TORO MASTER DEVELOPMENT PROGRAM  
 Subject: Draft BRAC Business Plan, MCAS El Toro of December 1999

Comment	Response
<p><b>Comments prepared by Mr. Michael Lapin, Manager, MCAS El Toro Master Development Program/Local Redevelopment Authority dated 21 January 2000.</b></p> <p><b>Addressee: Mr. Dean Gould, Naval Facilities Engineering Command, Southwest Division</b></p>	
<p><b>General Comments</b>                  Enclosed please find comments on the December 1999 draft report entitled "Base Realignment and Closure Business Plan, Marine Corps Air Station (MCAS) El Toro" (the Draft Business Plan) issued by the Department of Navy/United States Marine Corps (DON/USMC). The comments were prepared on behalf of the MCAS El Toro Master Redevelopment Program by GeoSyntec Consultants.</p> <p>Please note that some of the enclosed comments address the issue of proposed future land use designations. As you know, proposed site reuse plans have been presented in detail in the December 1999 Draft Environmental Impact Report prepared by the County for MCAS El Toro (EIR 573). The land use assumptions were forwarded to your office in an electronic format on October 22, 1999 and again on December 9, 1999. We would be pleased to work with you to ensure that the Draft Business Plan presents accurate information concerning the land use designations and proposed future uses of particular MCAS El Toro locations.</p> <p>We look forward to working with you on these and related issues.</p> <p>GeoSyntec Consultants (GeoSyntec) performed a preliminary review of the draft report dated December 1999 and titled "Base Realignment and Closure Business Plan, Marine Corps Air</p>	<p><b>Response:</b> We appreciate the comments you have provided on the Draft Business Plan. Responses to them are on the following pages.</p>

RESPONSES TO COMMENTS FROM THE MCAS EL TORO MASTER DEVELOPMENT PROGRAM

Subject: Draft BRAC Business Plan, MCAS El Toro of December 1999

Comment	Response
<p>Station (MCAS), El Toro, California" (the Business Plan) issued by the Department of Navy/United States Marine Corps (DON/USMC). The Business Plan provides a summary of the status of, management and response strategies for, and action items related to the environmental restoration and compliance programs at MCAS El Toro. The Business Plan is intended to present information available as of 31 December 1999, and describes environmental locations of concern, the acceleration initiatives implemented at MCAS El Toro, and pending BRAC projects.</p> <p>The Business Plan provides a useful summary of past and planned remediation and restoration activities at MCAS El Toro. However, GeoSyntec has noted in the Business Plan a number of issues that require clarification by DON/USMC. In addition, GeoSyntec has a number of questions regarding issues discussed in the business plan. Obtaining a response to these questions would help the MCAS El Toro Master Development Program (MDP) in its reuse planning efforts. The following is a list of issues and questions identified by GeoSyntec.</p>	
<p><b>Specific Comments</b>  <b>Comment 1.</b> The vision statement, which is shown on the "pre-cover" page of the Business Plan, states that the BRAC Cleanup Team's vision is to: "Maximize restoration and reuse by 1999." This vision statement, while possibly applicable to a previous draft of the Business Plan or BRAC Cleanup Plan update, should be updated to reflect the current status of the base, the present date (Year 2000), and future milestones for base reuse. Other similar statements (see, e.g., the discussion of "partnering" at page 12) may also require revision.</p>	<p><b>Response:</b> Comment will be incorporated. The vision statement will be revised for the final Business Plan. The discussion of partnering will remain in order to reflect the actual meeting and ensuing agreement which took place. A revision to the target date in this area is also in order.</p>
<p><b>Comment 2:</b> Exhibits 2 and 3 (see Business Plan at pages 5 and 6) provide information on the "location of concern" (LOC) at</p>	<p><b>Response:</b> Comment will be incorporated. The discrepancies between Exhibits 2 and 3 will be reconciled and the final updates</p>

RESPONSES TO COMMENTS FROM THE MCAS EL TORO MASTER DEVELOPMENT PROGRAM  
 Subject: Draft BRAC Business Plan, MCAS El Toro of December 1999

Comment	Response
<p>MCAS El Toro. (A LOC is an area of MCAS El Toro, which is potentially contaminated or is a potential source of contamination). These two exhibits indicate which of the LOCs received a "no further action" (NFA) status. It appears that there is a discrepancy between Exhibits 2 and 3 regarding the number of NFA sites for the storage tank LOCs and for the transformer LOCs. This discrepancy should be corrected and/or clarified.</p>	<p>for NFA status (through the end of calendar year 1999) will be incorporated in the final Business Plan.</p>
<p><b>Comment 3:</b> Page 7 of the Business Plan discusses the status of various LOCs. OU-2A, which is one of the LOCs, is said to include Sites 24 and 25; however, no information is given regarding Site 25. A brief status report concerning Site 25 should be added.</p>	<p><b>Response:</b> Comment will be incorporated. A statement pertaining to the status of Site 25 will be added.</p>
<p><b>Comment 4:</b> A section titled "Status of Environmental Restoration Program" which starts on page 4 of the Business Plan provides a brief status report concerning investigation and remediation at the various LOCs. This section does not appear to include a discussion of recent findings, plans for future investigations, and commitments from DON/USMC to revise remedies (e.g., if radioactive material is discovered at landfill sites or other MCAS El Toro locations). (See document titled "Historical Radiological Assessment" dated November 1999, issued by DON/USMC). Discussion of the potential presence of radioactive material at MCAS El Toro and its impact on remediation activities should be included in this section of the Business Plan.</p>	<p><b>Response:</b> Comment acknowledged. Additional information on the Installation restoration program can be found beginning on page 6. The HRA is briefly referenced on pages 13 and 14. A more detailed description will be included. Also, the DON/USMC plans to incorporate a brief summary of the findings of the HRA into the next Business Plan update after the Final HRA is completed.</p>
<p><b>Comment 5:</b> The status of investigation, remediation design, remediation implementation, and other similar activities is rapidly changing at MCAS El Toro. As the Business Plan represents a snapshot of such activities, it would be helpful to associate a given site status with a status date in the draft Business Plan. For example, Exhibits 2 and 3 should include a "status date." In</p>	<p><b>Response:</b> Comment acknowledged. The Business Plan is intended to present the status of the program as of 31 December 1999 as stated in the introductory paragraph on page 1. The exhibits, tables, figures, and attachments also convey the status as of 31 December 1999. The tables will be reviewed for accuracy.</p>

RESPONSES TO COMMENTS FROM THE MCAS EL TORO MASTER DEVELOPMENT PROGRAM

Subject: Draft BRAC Business Plan, MCAS El Toro of December 1999

Comment	Response
<p>addition, it appears that the status of the some of the sites has not updated recently. For example, Table 3 does not include reference to a draft ROD issued in March 1999 for Site 3 and 5. Thus it appears that the summary of the status of the various sites presented in the Business Plan should be verified and updated as needed to reflect recent information and developments.</p>	
<p><b>Comment 6:</b> At page 7 of the Business Plan, DON/USMC states the following regarding Sites 2 and 17: "Draft Final FS reports were submitted in September 1997, and a Draft Proposed Plan was submitted to the BCT in November 1997. The Draft Proposed Plan identified the preferred remedy for the former operational landfill areas at Sites 2 and 17 – a four-foot thick soil cover, that is considered a presumptive remedy by U.S. EPA." This statement implies that EPA has identified four-foot thick single-layer soil covers as a presumptive remedy. Evaluation of available USEPA documents (such as the report titled "Presumptive Remedy for CERCLA Municipal Landfill Sites dated September 1993") regarding presumptive remedies does not suggest that a four-foot thick single-layer soil cover is a presumptive remedy. Therefore, this statement should be revised by DON/USMC. A similar revision should be made to DON/USMC's discussion of presumptive remedies at page 8 of the Business Plan.</p>	<p><b>Response:</b> Comment will be incorporated. The text will be revised to state that the four-foot thick soil cover for Sites 2 and 17 is one type of source containment, and that source containment is a presumptive remedy identified by USEPA for municipal landfills. Similar revisions will be made to the discussions of the remedies for Sites 3 and 5.</p>
<p><b>Comment 7:</b> Proposed site reuse plans for some MCAS El Toro locations have changed in the past year. The Business Plan should be updated to reflect the revised proposed land uses as described in the Environmental Impact Report (EIR) published by the MDP in December 1999. An electronic copy of the MDP's proposed land uses was forwarded to your office on October 22, 1999 and again on December 9, 1999.</p>	<p><b>Response:</b> Comment incorporated. The most current proposed land use plan from the Draft Environmental Impact Report (EIR 573) shall be included in the final Business Plan.</p>

RESPONSES TO COMMENTS FROM THE MCAS EL TORO MASTER DEVELOPMENT PROGRAM  
 Subject: Draft BRAC Business Plan, MCAS El Toro of December 1999

Comment	Response
<p><b>Comment 8:</b> At page 11 of the Business Plan, DON/USMC states the following: "Since uncontaminated areas do not coincide with the zone designations based on current land use, the BCT and the LRA will work together to determine how to transfer these properties expeditiously." The meaning of this sentence is unclear (e.g., as to the definition of zones and as to the expeditious property transfer process). It would be helpful to revise this sentence to clarify DON/USMC's intent.</p>	<p><b>Response:</b> Comment will be incorporated. The text will be revised as follows: <i>"The BCT and the LRA will work together to determine how to transfer properties expeditiously."</i></p>
<p><b>Comment 9:</b> Table 2 includes a summary of the results of a risk assessment for Sites 2, 3, 5, 17, and 24. It would be useful to clarify whether the risk assessment results presented in Table 2 are for pre-remediation or for post-remediation conditions. In addition, for completeness and consistency, Table 2 should also be revised to include the results of other risk assessments conducted by DON/USMC for other sites at MCAS El Toro (such as risk assessment performed for Sites 8, 11, and 12 by DON/USMC).</p>	<p><b>Response:</b> As risk assessment can not be effectively communicated in such a restricted format, this column of information will not be included. The source documents should be reviewed in order to obtain a thorough understanding on this issue.</p>
<p><b>Comment 10:</b> Table 1 (Sheet 2 of 2) indicates that the radiological survey is in progress. GeoSyntec reiterates its request (presented in other, earlier memoranda presented to DON/USMC) that DON/USMC promptly provide to the LRA and GeoSyntec copies of the work plan for the radiological survey.</p>	<p><b>Response:</b> Comment will be incorporated. Table 1 will be revised to indicate that the HRA and the survey are in progress. The text of the Business Plan (Environmental Program Highlights for 1999 (page 13)) indicates that planning for the survey began in 1999. DON/USMC began work on the planning documentation in 1999, however, the draft Work Plan will not be issued until early 2000. The LRA will be provided with a copy of the draft Work Plan when the plan is issued.</p>
<p><b>Comment 11:</b> The reference to "early action items" in Table 1 (sheet 2 of 2) is unclear. It would be useful in the table or in relevant text of the Business Plan to clarify DON/USMC's meaning. In addition, DON/USMC may wish to consider characterizing its efforts to "implement" opportunities as "in progress" (versus "completed"), since DON/USMC is still in the process of "identifying" opportunities.</p>	<p><b>Response:</b> Comment will be incorporated and the table will be revised.</p>

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## TRANSMITTAL

Date: 29 February 2000

From: Lynn Marie Hornecker  
MCAS El Toro

To: Diane Silva  
Code 01LS.DS

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

*Installation:* Marine Corps Air Station, El Toro

*UIC Number:* M60050

*Document Title (or subject):* Responses to Comments on the Draft BRAC  
Business Plan, MCAS El Toro of December 1999

*Author:* Dean Gould, SWDIV

*Recipient:* Patricia Hannon, Regional Water Quality Control Board

*Record Date:* 18 February 2000

*Approximate Number of Pages:* 10

*EPA Category:* 01.1

*Sites:* All

*Key Words:* BRAC Business Plan

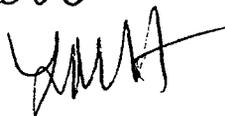
*Contract:* N/A

*CTO Number:* N/A

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Date: 29 February 2000

From: Lynn Marie Hornecker  
MCAS El Toro



To: Diane Silva  
Code 01LS.DS

**Subj: CERCLA Administrative Record Materials**  
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*Author:* Dean Gould, SWDIV

*Recipient:* TRISS Chesney, California Department of Toxic  
Substances Control

*Record Date:* 18 February 2000

*Approximate Number of Pages:* 10

*EPA Category:* 01.1

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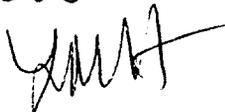
*Contract:* N/A

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MCAS El Toro



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*Author:* Dean Gould, SWDIV

*Recipient:* Glenn Kistner, U S Environmental Protection Agency

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