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November 2, 1999

Mr. Dean Gould
Base Realignment and Closure
Environmental Coordinator
MCAS El Toro
Department of the NAVY
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Subject: Updating the BRAC Closure Cleanup Plan for El Toro MCAS

Dear Dean:

The Technical Review Committee (TRC) of the El Toro Reuse Advisory Board (RAB) has reviewed the March 1999 MCAS El Toro Base Closure Cleanup Plan (BCP)submitted to the committee on August 17, 1999. Based on this review, the TRC identified six issues that require additional information and/or clarification. The following information should be incorporated into the 2000 update to the BCP.

Radionuclides

The information obtained from the Historical Radiological Assessment (HRA) along with recommendations for further study of radionuclide issues should be included in the BCP. The current information about Radon and Radium should be updated to include not only a survey of buildings but also of underground water wells, disposal systems, and sludge management at the former wastewater treatment plant. The statement that "additional testing or mitigation [for Radon] is not required" (page 3-23) has been shown to be short-sighted based on information presented at the 29 September 1999 RAB meeting. It is recommended that a complete review of all potential radionuclide issues be undertaken and that specific concerns

about disposal and contamination already raised regarding Radium 226, Radon 222, Strontium 90, and depleted Uranium be addressed. In addition, the issues of radiologic background concentrations need to be thoroughly reviewed. Section 6.4.1 of the BCP does not identify radionuclides as part of the background work that was statistically analyzed. Furthermore, there is concern that a "true" background sample was not obtained because of the possible historic use of radium-226 contaminated water on the golf course. Therefore, a rationale for the distribution and statistical analysis of additional radiologic samples should be included in the updated BCP.

Underground Storage Tanks

The BCP indicates that a total of 400 USTs are present at MCAS El Toro (pg. 3-11). Information provided to the TRC by the BRAC Environmental Coordinator in October 1999 indicates that more than 600 USTs may have been located on base. There are also discrepancies among the various agency databases (Navy, Orange County Health Care Agency, Environmental Health Division, and the Santa Ana Regional Water Quality Control Board) as to how many USTs have been closed, how many have been cleaned up, how many UST were closed in place, and how many are currently active. These discrepancies should be resolved and a complete accounting of the tanks provided. The status of soil and groundwater testing for MtBE in the vicinity of current and former USTs in unclear. Information previously provided in RAB meetings suggest that only one tank was found to have an MtBE release. While only a small number of tanks contained motor vehicle fuel, this release rate is remarkably low compared to the oil industry average of 60% or more of USTs that have leaked MtBE. The results of the Tiger Team assessment (pg. 3-13) on the UST issue should also be included in the next BCP update.

Fuel Distribution Network On-Base

The BCP provides some information about the off-site pipeline that provided fuel to the base. (See Page 3-14). However, there is little information concerning the integrity of the on-base portion of the fuel distribution network. While the off-site 8-inch pipeline is under the operational control of the Defense Fuel Supply Center, the fuel in the USTs at Tank Farm 555 and the distribution system from there are the responsibility of the MCAS El Toro. (see pg. 3-14). The BCP (pg 3-14) indicates that studies to investigate the integrity of the fuel distribution network on base have not been performed. The volume of fuel distributed by this system is large and related environmental concerns could be significant. The entire on-base fuel distribution system should be systematically surveyed to determine whether fuel leaks may have occurred. The BCP update should address the on-base fuel distribution system.

Perchlorates

The BCP does not address the presence and use of perchlorates on base. Information provided by the NAVY indicates that solid-fuel rocket boosters containing perchlorates were stored and may have been used on base. Furthermore, used rocket housings may have been cleaned and repacked for reuse on base. Perchlorates have been detected in perched groundwater at the site but the origin and distribution of perchlorates has not been adequately addressed. It is recommended that this issue be included in the next update of the BCP.

Industrial Discharges and NPDES Permit

The BCP only discusses the discharges to the sanitary sewer under the Station's Industrial Wastewater Discharge Permit No. 14-1-135 (pg. 3-24). The BCP does not identify when this permit was first issued nor does the BCP discuss discharge to and from industrial wastewater systems that were used prior to the issuance of the County Sanitation District permit. Historic records from the Santa Ana Regional Water Quality Control Board indicate that industrial wastewater discharges occurred under a Waste Discharge Requirement issued by the Santa Ana Regional Water Quality Control Board. These discharges routinely discharged into the Agua Chinon Wash. Possible contamination from the release of industrial wastes via these historic operations should be discussed in the BCP.

Proposed Schedule

The current Master Program Schedules for MCAS El Toro contain references to specific activities regarding the production of various documents for approval, review, etc. (See Figure 5-1.) The scheduled activities do not identify specific planned actions to be implemented by the NAVY to characterize or remediate contaminants. A more detailed summary of the proposed projects with identifiable milestones and time frames should be included in the BCP. The "early finish" dates need to be more realistic.

The organization of scheduled activities by Operable Unit may be useful for the Navy, but is confusing to those outside the program. We recommend that the schedule be organized by issue, or some other manner to facilitate communication with the public.

Summary

The RAB and the Review Committee appreciate the amount of work the NAVY and its subcontractor have undertaken at El Toro. It is the unanimous position of the committee that the above-identified issues must be incorporated into the year 2000 BCP update for MCAS El Toro.

If you have any questions concerning these matters, please feel free to discuss them with the Technical Review Committee members or me. We would appreciate it if you could distribute a copy of this letter at our next meeting, and include it in the minutes.

Very truly yours,

Greg Hurley
RAB Committee Chairman

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