

**MARINE CORPS AIR STATION
EL TORO, CALIFORNIA
RESPONSES TO EPA COMMENTS ON
RCRA FACILITY ASSESSMENT
DRAFT PRELIMINARY REVIEW REPORT**

9 JULY 1991

PREPARED BY:
Southwest Division, Naval Facilities
Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

THROUGH:
CONTRACT #N68711-89-D-9296
CTO #099
DOCUMENT CONTROL NO:
CLE-C01-01F099-B2-0005

WITH:
Jacobs Engineering Group, Inc.
3655 Nobel Drive, Suite 200
San Diego, California 92122

In association with:
International Technology Corporation
CH2M HILL
Grigby/Graves



Project Manager



Technical Reviewer

**RESPONSES TO
EPA COMMENTS ON

RCRA FACILITY ASSESSMENT
DRAFT PRELIMINARY REVIEW REPORT

MARINE CORPS AIR STATION, EL TORO
EL TORO, CALIFORNIA**

GENERAL COMMENTS

1. There are two major problems with the report:
 - o Individual Solid Waste Management Unit (SWMU) descriptions have not been provided
 - o Release potentials have not been addressed.

Response #1 - The two items mentioned above depend on information from the VSI and were therefore planned for inclusion in the next version of the report (i.e., the draft PR/VSI Report). The requested information will be addressed in that report.

2. General problem: Text needs to refer to "sites" or units, areas of concern (AOCs), and spill by SMU number and identify by unit number on a site map.

Response #2 - Agreed. Comment will be incorporated.

3. It would be useful to have a table listing buildings by building number, or area (such as airfield) with the building function or operation, wastes managed, and associated SWMU numbers. Example: (Fictional units for illustration purposes only) Building 513 Aircraft Paint Stripping, Wastes Managed; waste, solvents, paint, sludge, metals; SWMU 112 Drum Storage Area; SWMU 113 Paint Wash-Down Booth; SWMU 114 Aircraft Washrack.

Response #3 - Each SWMU/Area of Concern will have an individual write-up in which waste information and adjacent building number will be provided.

4. Site Operations and Hazardous Waste: This section is seriously underdeveloped. It should provide a clear explanation of operations and specific information on where, when, and how waste materials generated at the site are disposed or transported offsite for disposal.

This section needs, at a minimum, a list of wastes or a description of the categories and generation points of wastes managed at the site. Other hazardous materials (nonwastes) should be mentioned as appropriate or known (for example, PCB transformers on Page 3-46, asbestos, or chemical storage areas).

Response #4 - Additional information on current site operations and hazardous waste will be provided in this section. Available information on past site operations

significantly differing from the current operation (e.g., former metal plating operation) will also be provided.

5. The report should state the total number of SWMUs and AOCs identified in the PR Report (appropriate for Section 1.0 Introduction and/or Executive Summary).

Response #5 - Agreed. Comment will be incorporated.

6. It is obvious from the PR Report that a great deal of effort went into reviewing file material from a wide variety of sources. The thoroughness of such a review is appreciated. The focus of the RFA PR is the identification of SWMUs. The record information reviewed needs to be presented in a detailed SWMU-by-SWMU description format, which has not been done in this PR Report. Information to be included in each SWMU description includes the type of information in Table 5-1, Visual Site Inspection (VSI) Checklist (wastes managed, materials of construction, release controls, period of operation, location, dimensions/capacity, etc.). The VSI is to be used as a supplemental tool to update, correct, and fill in information gaps in the PR SWMU descriptions.

Response #6 - The next version of the report incorporating the results of the VSI will include individual descriptions of SWMUs/Areas of Concern.

7. Release controls are not addressed in the PR Report. There also is no Exposure Pathways and Human and Environmental Receptors section. (EPA Region IX report format guidance lists it as a separate chapter.)

Response #7 - These items could not be adequately addressed through the PR portion of the RFA and were not included in the draft PR Report. They will be addressed in the next version of the report which will incorporate the results of the VSI.

8. With respect to Section 3, it is good that so many records were reviewed for this PR Report. Instead of 72 pages of summarizing records by source, the information should briefly describe the sources, list them as references, and group the discussion into appropriate areas -- SWMU descriptions, regulatory history, site operations, and past and ongoing contamination investigations.

Response #8 - Individual SWMU descriptions, additional information on site operations and waste generation, and transferral of appropriate regulatory history information from the PR into the regulatory history section are planned for the next version of the report.

SPECIFIC COMMENTS

1. Table of Contents (iii): Missing 1.1, Purpose of the RCRA Facility Assessment (RFA Report Format, Region IX RCRA Facility Assessment Brief Guidance to EPA Work Assignment Managers).

Response #1 - A Section 1.1, Purpose of the RFA, will be added to the text.

2. Table of Contents (iii): Missing historical description of facility section.

Response #2 - Current Section 1.1 (entitled Description of Station and Station Mission) contains historical information on the station. This section will be renamed.

3. Page 1-3, Section 1.2. Site Location: Report fails to state approximate distance to recently developed commercial, light industrial, and residential land use.

Response #3 - The requested information will be added to the text.

4. Page 1-4, Section 1.4. Information contained in Section 3.0 Records Review (especially Page 3-49) on RCRA violations) is also relevant to Section 1.4.

Response #4 - This information will be included in the requested section.

5. Page 1-5, Figure 1-1. Site Location Map is missing North arrow.

Response #5 - Revision will be made as requested.

6. Page 1-10, Section 1.4. Previous Site Investigations and Regulatory History: Discussion changes from TCE to VOCs. What other VOCs were found; why change from TCE to VOC? Text mentions shallow groundwater -- what depth?

Response #6 - In June of 1985, OCWD discovered the presence of TCE in agricultural wells owned by The Irvine Company. In later investigations, additional VOCs were detected. Other VOCs detected in the groundwater are PCE, chloroform, and carbon tetrachloride. The shallow groundwater is about 100 feet below land surface. This information will be added to the text.

7. Page 2-8, Section 2.7. Ecology. Residential land use is mentioned on Page 1-3, Section 1.2. Is the residential property mentioned on Page 1-3 the same as the 6,000 resident population at the facility? What is the distance and direction to the nearest offsite residential property? Are there schools or parks located near the site?

Response #7 - The residential land use mentioned on page 1-3 was off-station. Elaboration on the offsite residential area, nearby parks, schools, etc., will be provided.

8. Page 3-1, Section 3.0. The statement is made in the report that not all SWMUs and AOCs will be included in the RI/FS. Because SWMU release potentials have not been evaluated in this report, how can it be determined that the units do not pose an environmental threat worthy of investigation under the RI/FS.

Response #8 - The sentence will be reworded to state that not all SWMUs/Areas of Concern would be "expected" to be included (or be appropriate to include) in the RI/FS. As reworded, the sentence does not preclude the possibility (although remote) that every one of the 239 SWMUs/Areas of Concern identified in the PR may potentially be included as sites in the RI/FS.

9. Page 3-2, Section 3.1. Detailed descriptions of the 22 previously identified RI/FS sites should be presented in this RFA PR Report.

Response #9 - The 22 RI/FS sites will not be investigated in the RFA. Therefore, detailed descriptions of these sites are not planned for inclusion in the RFA reports.

10. Page 3-5, Section 3.1, Table 3-1. "Site" name or unit title underneath site number would be helpful. The SWMU number would be preferable, but "Tank #" or "Southwest Landfill", for example, would be acceptable.

Response #10 - A footnote will be added to Table 3-1 referencing the site names located previously in this section on pages 3-1 and 3-2.

11. Page 3-17, Section 3.2.1.2. Inspections and Notices of Violations. Runoff from Bordier's Nursery is referred to. What is Bordier's Nursery; is it on the facility property or offsite? Does runoff from the nursery possibly contain pesticides or herbicides?

Response #11 - A statement will be added to the text saying that Bordier's Nursery is located offsite.

12. Page 3-17, Section 3.2.1.3. Miscellaneous Correspondence from MCAS El Toro to the RWQCB and Telephone Records. It is good to know that the Marine Corps is instituting a program to better control aircraft and vehicle washing operations and unauthorized discharges.

Response #12 - No response required.

13. Pages 3-17 and 3-18, Section 3.2.1.3. Was any soil or sediment sampling performed after the spills? Do residues/contaminants remain? Was there any file data indicating results of sampling and chemical analysis?

Response #13 - Analytical results are not available for the various spills. These spills entered the Bee Canyon and Agua Chinon Washes via storm drains. Unlined portions of these two channels are strong candidates for inclusion into the RI/FS program.

14. Page 3-19, Section 3.2.2. California Department of Health Services. Is open burning/open detonation currently occurring at the facility? If so, what is the SWMU No.?

Response #14 - Open burning/open detonation occurs at the Explosive Ordnance Range, Site 1 in the RI/FS. This site is excluded from investigation in the RFA.

15. Page 3-20, Section 3.2.2. A PCB storage area is mentioned. Is this a SWMU? Include additional information on the PCB storage unit (location, period of operation, building materials, operation procedures, length of storage, type of container, and source of generation).

Response #15 - This PCB storage area is SWMU Number 128, Building 445. In 1987, two PCB transformers were stored in this building.

16. Page 3-23, Section 3.2.3. Change "No SWMUs or areas of concern were identified..." to read "No additional SWMUs or areas of concern were identified..."

Response #16 - Change will be made as requested.

17. Page 3-24, Section 3.2.4. Orange County Health Care Agency (OCHCA). Results or summary of soil sampling for tank releases are not presented. The report states that no AOCs were identified from the OCHCA records review, yet there is no information in the report on the quantity spilled or clean-up activities.

Response #17 - The text will be revised to state that Tank 800-E (waste oil) will be included as a SWMU. The other tanks will be investigated under the UST program at MCAS El Toro. (It should be noted that Tank 800-E had been identified later in the draft report as a SWMU in Section 3.3.)

18. Page 3-27, Section 3.2.6. Irvine Ranch Water District. This is the first mention of a sewage treatment plant at the facility. Such information would be appropriate in Section 1.0 describing facility waste management. Are there any laboratory sinks or repair areas (other than oil/water separators) that discharged to the sanitary sewage system?

Clarify in the text that the sewage treatment plant at MCAS El Toro is no longer operating at the site (per information contained on Page 3-30, Section 4.4; Identification of Sewer Lines).

Response #18 - The sewage treatment plant was described in Section 1 on page 1-4. Its period of operation and its eventual demolition are also described.

19. Page 3-28, Section 3.3. Comprehensive List of USTs at MCAS El Toro. Keep in mind before eliminating individual tanks to review what the past contents were, not just current contents. Tanks once containing wastes that now contain product, even if the tank has been thoroughly cleaned, can be considered SWMUs.

The second paragraph mentions discrepancies found in UST information. Discrepancies should be evaluated during the VSI. The VSI checklist should provide a list of specific discrepancies and relevant questions to be asked, such as, "Did Tank No. XX at the Primary Motor Pool contain waste oil prior to mid 1980s?" Listing specific questions for units identified by number or name prior to conducting the VSI helps to ensure that the information gap will not be overlooked and allows for an inspector, who did not prepare the PR Report, to conduct the VSI adequately. (Cross-Reference Comment re: Section 5.0, Page 5-1, Next Phase of Work - Visual Site Inspection.)

Response #19 - The available tank records and station personnel have been checked to determine if tanks formerly storing waste are currently being used for product storage.

20. Page 3-29, Section 3.3. Comprehensive Lists of USTs at MCAS El Toro. Sufficient proof has not been provided that the OCHCA permit applications are in error regarding No. 2 waste oil/No. 2 fuel oil. These tanks under question should remain as potential SWMUs until verified during the VSI. Add specific questions about this unit to the VSI checklist.

Response #20 - The tanks in question stored No. 2 fuel oil in the past and have since been filled with sand. On the permit forms, the station checked the box labeled "waste" instead of the box labeled "product" for the current contents of these tanks abandoned in place with sand. For the past material stored in these tanks, the forms state No. 2 fuel oil (i.e., product). Thus, the forms do not state that waste No. 2 fuel oil was stored in the tanks. The text will be reworded to clarify this point.

21. Page 3-29, Section 3.3. Although product USTs are not viewed as SWMUs, it is regarded as prudent to visually inspect the tank area during the VSI. The last paragraph is a good example of planning to investigate inconsistent PR findings during the VSI.

Response #21 - Available records and interviews of station personnel have been used to identify over 90 waste USTs at the station. These waste USTs will be visited during the VSI. In addition, 16 USTs with unknown storage contents have been added to the list of SWMUs/Areas of Concern. Individual product USTs are not planned to be visited during the VSI. It should be noted that these product tanks will be investigated under MCAS El Toro's UST program in which they will either be removed or monitored for leak detection.

22. Page 3-30, Section 3.4. Paragraph 2 mentioned the MCAS El Toro Sewage Treatment Plant that operated from approximately 1943 to the 1960s. Where was this system located? What is there now? Is there any information on what tanks, treatment units, or ponds were associated with the system?

Response #22 - The plant was located directly adjacent to and east of RI/FS Site 12, Sludge Drying Beds. There is only limited information available on the sewage treatment system. It was a trickling filter system for biological treatment of sanitary waste. This information will be added to the text.

23. Page 3-31, Table 3-5. Waste Underground Storage Tanks. A MCAS El Toro Environmental Department Recycling Section is identified under "Comments" in this Table. Information about this department should be included in Section 1.3, Site Operations and Hazardous Waste of the PR Report.

If tank-testing data is available, include it in this Table. The separate columns for Current Contents and Original Contents are well presented, as well as the fact that installation dates are known for so many units.

What type of solvent is stored in Tank 359C (500-gallon steel tank, installed 1982)?

Response #23 - The Recycling Section of the Environmental Department will be mentioned in the section on Site Operations. There is only very limited tank testing data for waste tanks. The available results will be added to the report. Tank 359C was used to store spent Stoddard solvent (see page B-10 in Appendix B). This will be added to the table.

24. Page 3-46, Section 3.5.1.3. Has the "major leak" of PCB-containing fluid from a transformer south of Building 457 been identified as a SWMU/AOC? Were soil sampling data or clean-up information available?

Regarding irrigation of the MCAS Golf Course with water effluent from the onsite wastewater treatment plant, is any effluent water quality data available? Were there any routine tests of effluent quality? Were there past experiences of unauthorized releases to the sanitary sewer system? (For example, on Page 3-48, the report mentions that it was standard practice to release film-processing wastes to the sanitary sewer.) Unknown information should be investigated during the VSI.

Response #24 - The leak of PCB-containing fluid south of Building 457 will be added to the list of SWMUs/Areas of Concern. There is no additional information available beyond the reference to the leak and the location near Building 457. Since the golf course received effluent from the former sewage treatment plant as irrigation water, it will also be added as a SWMU.

25. Page 3-47, Section 3.5.2.1. Based on the report that the facility regularly discharged wastewater containing oils, caustic compounds, and detergents from wash racks to storm sewers, careful review of storm sewers is suggested. Discharge was estimated to be as great as 100,000 gallons per day and as little as one million gallons/month. Also, runoff from other, unbermed areas, such as a crash crew training pit was reported.

Based on a discussion of film-processing waste (Page 3-48), look for evidence of film processing waste discharge to storm sewers near present and former film developing areas. This may also be an area for suggested sampling.

Response #25 - The storm sewer system at MCAS El Toro drains primarily to Bee Canyon and Agua Chinon Washes. Portions of these washes are unlined. Based on past spills and disposal practices, these washes are strong candidates for inclusion into the RI/FS program. The discharge of the film-processing waste was to the sanitary sewer rather than to storm sewer as stated in the comment. The sanitary sewer system at MCAS El Toro is a SWMU/Area of Concern.

26. Page 3-48, Section 3.5.2.1. The PCB and fuel spills between 1978 and 1983 are discussed. Have these spills been addressed as SWMUs/AOCs? (If so, what SWMU/AOC number or area?)

Response #26 - The fuel spills are described as reaching the Bee Canyon and Agua Chinon washes which are SWMU Numbers 4 and 11, respectively. The PCB spill was described as occurring between Buildings 369 and 335 when a transformer fell off the back of a truck. This PCB spill site is Site 11 in the RI/FS and will not be investigated in the RFA.

27. Page 3-49, Section 3.5.2.1. The first paragraph mentions RWQCB citations of the MCAS sewage treatment plant for discharging "inferior quality effluent". Is there information on which constituents/characteristics and concentrations were not of compliance? This is of concern, because effluent from the plant was used for irrigation of the golf course. Should the golf course be evaluated as an AOC?

Response #27 - The golf course will be added to the RFA as a SWMU/AOC. In addition, the irrigation tank at the golf course and the pipeline from the former sewage treatment plant to the irrigation tank will be added as SWMUs/AOCs. The RWQCB citations did not provide specifics about inferior water quality. Past data on the

effluent is primarily wastewater parameters such as pH, sodium, nitrates, etc. and does not include hazardous compounds.

28. Page 3-49, Section 3.5.2.2. SOUTHWESTDIV Box 2. This is the first mention of facility RCRA Interim Status. Information provided here (RCRA Interim Status and violations) is not included in Section 1.4: Previous Site Investigations and Regulatory History.

Hazardous waste storage areas and the DRMO should be mentioned in Section 1.3, Site Operations and Hazardous Waste Generating Activities.

Response #28 - Agreed. Revisions will be made as requested.

29. Page 3-49, Section 3.5.2.2. The DRMO is not included in Table 4-1, SWMUs and Areas of Concern. (Cross-reference to Table 4-1.) Verify during the VSI that hazardous wastes are no longer stored at the DRMO.

Response #29 - The DRMO storage yard is included as Site 8 in the RI/FS. It is therefore excluded from investigation under the RFA.

30. Page 3-50, Section 3.5.2.2. Remedial action for UST 398 was not found in Appendix A, as stated on Page 3-50.

Response #30 - This was a typographical error. The reference should have been to Appendix B. The text will be revised.

31. Page 3-50, Section 3.5.2.2. Is it appropriate to just say "Leaking USTs and precision testing of tanks are being addressed in other CTOs under the Navy CLEAN Program" without providing anything other than a list of tank information in Appendix A? No discussion is presented on what activities are planned under CTOs. There are over 400 USTs at the site, many dating back to 1943.

Response #31 - A brief description of the station's plans for the UST program will be added to the text.

32. Page 3-50, Section 3.5.2.3. The VSI of the drainage channels should include a close observation near Building 359 (SWMU No. 100 and 101) where two degreasing tanks discharged to the storm sewer (and a possible recommendation for sampling). At least one of the tanks contained TCE.

Response #32 - Agreed.

33. Page 3-51, Section 3.5.2.4. RWQCB Cease and Desist Order 72-5 should be mentioned in Section 1.4. Previous Site Investigations and Regulatory History, and/or Section 3.2.1.2, Inspections and Notices of Violations.

Response #33 - Agreed. Comment will be incorporated as requested.

34. Pages 3-52 and 3-53, Section 3.5.2.4. Note: Units associated with the former MCAS wastewater treatment plant and industrial discharges to storm sewers should be evaluated for the constituents mentioned on Page 3-52; chromic acid, sodium

cyanide, sodium silicate, phosphates, cadmium and zinc salts, soaps, cresol, oils and grease, acids, pigments, arsenic, hydrofluoric acid, and chromium (Page 3-53).

Response #34 - Agreed.

35. Page 3-54, Section 3.5.2.5. Open burning of trash reported in the County of Orange Air Pollution Control District letter. Is open burning included as an area to be addressed during the VSI?

Response #35 - The letter does not specify the location of open burning. However, at the time of the letter (i.e., June, 1965) open burning occurred at the Perimeter Road Landfill. This landfill is RI/FS Site 5 and it will not be investigated under the RFA.

36. Page 3-55, Section 3.5.3.2. Geotechnical Branch. Several soil investigation reports are referred to in this section. Soil characteristics, conditions, and the summary of boring data should be included in Section 2.4, Geology.

Response #36 - The boring data from these geotechnical reports is not planned for inclusion into the report.

37. Page 3-57, Section 3.5.4. MCAS El Toro Files. Additional Marine Corps records that could be consulted for historical information include purchase orders, material inventories, and historic operations, such as unit commands assigned to the facility.

Response #37 - Available station records were reviewed for the PR. Historical purchase orders and material inventories are not available for review.

38. Page 3-57, Section 3.5.4. List the three land-farming sites. How long has the "ongoing" land-farming of contaminated soil been occurring? Is the material being sampled either prior to or after land-farming?

Response #38 - The landfarming sites were not specifically identified in the correspondence reviewed at the station and are not listed in Section 3.5.4. The sites were identified through interviews of station personnel. A reference to Section 3.8, Interviews of Station Personnel, will be added to Section 3.5.4 for a description of the location of the landfarming sites. The landfarming activities occurred within about the past 5 years. The landfarmed soil was contaminated with JP-5. Since the nature of the contaminants and the activity at the SWMU are known, analytical results (even if available) would not provide information beyond what is already known.

39. Page 3-58, Section 3.5.4. True, nonroutine or one-time spill sites do not fall under EPA definition of a SWMU; however, they can be investigated as an AOC. If spills are of sufficient quantity, high toxic or inadequately cleaned, or on bare ground, they should properly be investigated as an AOC during the VSI.

Response #39 - Agreed.

40. Page 3-63, Section 3.6.3. First mention in the report of sludge drying beds associated with the former sewage treatment plant. A comprehensive description of the sewage treatment plant should be provided in an early section of the report.

Response #40 - The sludge drying beds are included in the list of RI/FS sites on page 3-2. The sewage treatment plant is described in Section 1 on page 1-4. Some additional information will be provided in the text.

41. Page 3-63, Section 3.6.3. Building 673 is referred to as a permitted hazardous waste storage facility. Presumably this means it is an Interim Status storage facility. Please check the correct status and terminology (i.e., it is not a true RCRA-permitted storage facility unless the Part B Permit has been approved.)

Response #41 - Building 673 is an Interim Status storage facility. A Part B Permit will be developed for MCAS El Toro under a separate CTO which has just recently been started.

42. Page 3-64, Section 3.6.4. True, it is highly speculative to say whether darkened areas in aerial photographs represent staining. Do these darkened areas have vegetation, possible vehicle traffic markings, stored items, or possible pond or sludge areas? Are the areas rectangular or irregular in shape; how do they change from photograph to photograph?

Response #42 - Vegetation, possible vehicle traffic markings, pond areas, etc., were not observed at the darkened areas in the photographs.

43. Page 3-65, Section 3.6.4. Orange County Flood Control. This reviewer disagrees with the statement that aerial photographs from 1947 and 1952 were not worth reviewing, because the scale (1 inch - 3,000 feet) was such that a meaningful identification could not be made. It is true that with such a scale, it is difficult to see detail; however, if the same reviewer compares serial photographs from 1947 or 1952 with 1970 photos, changes in development or land use can be seen.

It would be appropriate, however, to say that 1947 aerial photographs from another source with greater detail (scale: 1 inch - 600 feet) were reviewed; thus, the 1 inch - 3,000 foot scale photographs were not reviewed for this PR.

Response #43 - The suggested explanation/rationale is preferable to what the report currently states. It will be incorporated into the text.

44. Page 3-65, Section 3.6.4. Whittier College. The EPA disagrees with the statement that photographs predating the existence of the facility are of "no value to the RFA." Such photographs show what the land use was prior to facility use and are relevant to the site history. In addition, facility start-up dates are often shaky, and related activities often precede official facility operations. Prefacility photographs often show natural topography. Activities such as backfilling of natural drainage ways can influence contaminant dispersal and migration, which may be relevant to later soil and groundwater investigations.

Response #44 - The word "no" will be changed to "limited." These photographs are not planned for review.

45. Page 3-66, Section 3.7. Abandoned Wells. The two abandoned oil wells may provide a conduit for transfer of groundwater contaminants to lower aquifers.

Response #45 - Agreed. No action required.

46. Page 3-67, Section 3.8. Excellent job of contacting two retired workers from the facility. As can be seen, long-time employees can be a source of otherwise undocumented history of operations.

Incinerator used to burn wastes for volume reduction in the 1950s should be mentioned in Section 1.0.

Response #46 - The incinerator operation was briefly described on page 1-4 in Section 1.

47. Page 3-68, Section 3.8. The EPA disagrees with grouping the abandoned metal plating sewer lines with the existing (and currently used) sewer lines as one SWMU. Because different waste streams are managed and are under different periods of operation, it is suggested they be viewed as separate SWMUs.

Response #47 - The suggestion of designating separate SWMUs for the abandoned metal plating lines and the sanitary sewer lines will be incorporated.

48. Page 4-5, Table 4-1. SWMUs and Areas of Concern. Good, detailed table, but the print is too small, and the table is difficult to read. Suggestions: Increase the size to 11" x 17" and narrow the column width for easier viewing.

Use the SWMU numbers presented in the first left-hand column whenever referring to a particular SWMU in the text.

Please explain SWMU Nos. 1 and 2. "Other Solid Waste Site." What are these units?

Add sites currently under the RI/FS to Table 4.1. The RI/FS sites can be identified as such in the table.

More detail can be added to the Current/Original Contents column. For example, SWMU No. 7, the PCB Transformer Storage Area, has been left blank. Please add PCB transformers under the Contents column.

Response #48 - The print in Table 4-1 will be enlarged. SWMUs 1 and 2 were identified from NEESA photographs and were listed as "Other Solid Waste Sites" since they did not fall under categories such as UST, drum storage area, etc. One site contained piles of vegetation and the other appeared to be a scrap metal storage area. This information will be added to the table. The RI/FS sites will not be investigated under the RFA and will not be included in the table. Additional detail on the SWMUs/Areas of Concern will be provided in individual write-ups in the next version of the report.

49. Page 4-23, Section 4.2.1, Table 4-2. List of RWQCB Sites Excluding USTs and Drum Storage Areas. It is not immediately clear if the units in this table are included in Table 4-1 or are additional units. Please add a footnote to Table 4-2 or SWMU numbers to the table's title. Do the same with Table 4-3, Hazardous Waste Storage Areas.

Response #49 - This section is planned for reorganization. Since Tables 4-2 and 4-3 presented information available in other tables in the report (i.e., Tables 3-3, 3-5, and 4-1), they will not be included in the next version of the report.

50. Page 4-3, Section 4.2. Give the SWMU number each time a specific unit is mentioned in the text. (It is difficult to determine if a unit is the same as the one previously identified or a newly-introduced unit.)

Response #50 - SWMU numbers will be given in the text.

51. Page 5-1, Section 5.0. The report states that one of the objectives of the VSI is to fill data gaps identified in the PR. Specific questions and information needs should be written prior to the VSI to ensure that the necessary data gaps are addressed.

Response #51 - Both written and verbal communication will be used to identify specific questions and information needs. It should be noted that the resolution of data gaps will be an ongoing process throughout the entire RFA.

52. Page 5-3, Section 5.0, Table 5-1. Add to VSI Checklist:

| | |
|------------------------------|---|
| Under Unit Design: | Secondary containment/release controls |
| Under Unit Operation: | Period of Operation Operation Process |
| Under Physical Condition: | Maintenance/housekeeping cracks or corrosion |
| Under Waste Characteristics: | Volume, quantity |
| Under Exposure Potential: | Nearby receptors (schools, playground, pond, forest, wells, etc.) |

Response #52 - The EPA comment on the checklist was received too late to be formally incorporated into the checklist. All of the above items, however, have been investigated during the VSI.

53. Page 5-11, Section 5.0, Table 5.2. SWMU/Area or Concern Evaluation Form: Under Recommendations, a fourth option is to suggest a RCRA Facility Investigation (RFI) or address under the RI/FS program.

Additional information that could be included in a VSI checklist includes a review of facility documents such as manifests, inventories, and monitoring reports. Interview site workers if possible.

Response #53 - A RCRA Facility Investigation (RFI) will be listed as a possible option in the report.

54. Page 5-13, Section 5.0. The revised "Draft PR Report" submitted after the VSI should be identified as a draft PR/VSI Report.

Response #54 - Comment will be incorporated as requested.

55. Page A-4, Appendix A. UST Inventory from EG&G Idaho Report. Abbreviation "cc" under Tank Type is not identified. What is "cc"? What test methods were used for the Leak Test? Based on this reviewer's experience, it is suspicious that all tanks tested passed, especially considering the age (1943) of many of the tanks. Is any integrity data available on concrete tanks?

Response #55 - The abbreviation "cc" will be identified as cylindrical concrete. The tanks were tested by the Horner EZY-CHEK method. No integrity data is available on concrete tanks. Of the 14 waste tanks tested, 13 passed and 1 failed the tank tests. This tank test information will be provided in Table 3-5 in the report.

56. Pages A-20, A-21, A-22. Please revise these pages. Pages refer to Table 3-3. There is no Table 3-3. Footnote numbers on Page A-20 do not match either the UST Inventory (Page A-1) or A-20.

Response #56 - The title "Table 3-3" is a typographical error and will be deleted. The notes and references on pages A-20, A-21, and A-22 appear in the Comments column in the main UST table in Appendix A. For example, 2-A, B, D refers to footnote number 2 which is based on information contained in references A, B, and D.

57. Pages B-1 to B-29, Appendix B. Includes detailed information appropriate for individual SWMU writeups.

Response #57 - Selected information from Appendix B will be included in the individual SWMU write-ups.

58. Page C-4, Appendix C. The 1945 James M. Montgomery Report states, "The groundwater is very high in this area and is constantly being drained away by drainage ditches." Due to the lack of other site-specific shallow groundwater and hydrology information contained in Section 2, this comment should be added to the text.

Response #58 - Since no basis for this remark is provided in the report and it is the only mention of groundwater in it, there is not sufficient reason to reference this vague, poorly-defined statement about groundwater in Section 2.

59. Page C-25, Appendix C. Oily Waste Inventory. Inactive Paint Spray Booth discharge of wastewater with paint to the storm sewer is not mentioned in the text. Add waste paint to the list of materials discharged to storm sewers. (Buildings 370, 130.)

Response #59 - The discharge of wastewater with paint to the storm drain will be mentioned in the text.

60. Page C-27, Appendix C. Seepage pit at Building 626 Steam Cleaning Area should be included as part of the storm sewer investigation.

Response #60 - This area is part of RI/FS Site 20, Hobby Shop, and will not be investigated under the RFA. It should be noted that the drainage channel receiving this runoff will be investigated as a SWMU under the RFA.

61. Page C-32, Appendix C. A map in Appendix C shows onsite housing, school, playgrounds and ball fields; these should be identified on a site map and/or described in the Ecology Section.

Response #61 - These will be mentioned in the text and placed on a site map.

62. Page C-36, Appendix C. A survey of Air Emission Sources at MCAS El Toro provides a good example of activities conducted at specific buildings. This survey could be referenced to in Section 1.0 of the PR Report.

Response #62 - A reference to this table will be made in Section 1.