



## Department of Toxic Substances Control



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
5796 Corporate Avenue  
Cypress, California 90630

Gray Davis  
Governor

August 17, 2000

Mr. Dean Gould  
BRAC Environmental Coordinator  
Marine Corps Air Station El Toro  
Base Realignment and Closure  
P.O. Box 51718  
Irvine, California 92619-1718

PROPOSED FEDERAL FACILITY AGREEMENT (FFA) SCHEDULE FOR OPERABLE  
UNIT (OU) 2B, INSTALLATION RESTORATION PROGRAM (IRP) SITES 2 AND 17,  
MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

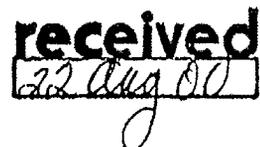
The Department of Toxic Substances Control (DTSC) received your letter dated August 2, 2000 proposing deadlines for the completion of post-Record of Decision draft primary documents. The proposal is made pursuant to Section 8.2 of the FFA.

As indicated in your letter, the Department of the Navy (DON) suggests consolidation of similar documents to increase efficiency and facilitate review. These suggestions include consolidation of the Construction Quality Assurance and Quality Control Plans into a single document to be referenced as a Contractor Quality Control (CQC) Plan. The CQC Plan would then be provided as an attachment to the Remedial Design documents. DTSC approves the suggested modifications as long as the consolidated document contains the same information required for the individual documents.

Additionally, DON proposes incorporation of the Contingency Plan (CP) into the Operation and Maintenance (O&M) Plan. Based upon subsequent correspondence, DTSC understands that the DON believes that the purpose of the CP is to address emergencies following construction of the landfill caps. As a result, the DON suggests incorporating the CP into the O&M Plan.

However, DTSC is concerned that potential short term risks to the public during preparation and construction of the cap should be included in the CP. According to United States Environmental Protection Agency guidance, the purpose of the

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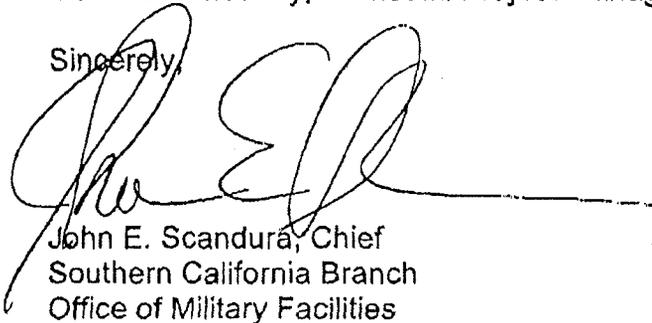
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contingency plan is to ensure protection of the local community in case of an emergency at the site. This plan should include air monitoring and spill control countermeasure elements. As such, this information should be submitted with the Remedial Design/Remedial Action Work Plan, rather than with the O&M Plan.

Since it is unclear whether potential short term risks will be addressed by DON, DTSC does not approve incorporation of the CP into the O&M Plan. DTSC requests further clarification regarding a plan to address short term potential risks/emergencies prior to approving the proposed schedule. If you have any questions, please contact Ms. Triss Chesney, Remedial Project Manager at (714) 484-5395.

Sincerely,



John E. Scandura, Chief  
Southern California Branch  
Office of Military Facilities

cc: Mr. Glenn Kistner  
Remedial Project Manager  
U. S. Environmental Protection Agency Region IX  
Superfund Division (SFD-8-2)  
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San Francisco, California 94105-3901

Mr. John Broderick  
Remedial Project Manager  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
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Mr. Gregory F. Hurley  
Restoration Advisory Board Co-chair  
620 Newport Center Drive, Suite 450  
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cc: Ms. Polin Modanlou  
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Santa Ana, California 92703  
via facsimile (714) 834-6120

Mr. Steven Sharp  
Orange County Health Care Agency  
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