



Department of Toxic Substances Control

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U.S. ENVIRONMENTAL PROTECTION AGENCY



Winston H. Hickox
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January 22, 2001

Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
Base Realignment and Closure
P.O. Box 51718
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DRAFT RECORD OF DECISION, OPERABLE UNIT 3B, NO ACTION SITES 7 AND 14,
MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) has received the above draft Record of Decision (ROD) for Operable Unit (OU) 3B, Installation Restoration Program (IRP) Sites 7 and 14, dated November 2000. The draft ROD presents the selected remedial action for Sites 7 and 14. Based on the results of the Remedial Investigation (RI) and human-health risk assessments, the Department of the Navy (DON) has determined that no remedial action is necessary to assure the protection of human health and the environment at Sites 7 and 14. The RI showed that site-related contamination is limited to the shallow soil interval (0 to 10 feet below ground surface). The human-health risk assessments show that the chemicals present in soil do not present an unacceptable risk to human health or the environment.

Shallow groundwater underlying these sites is contaminated by volatile organic compounds (VOCs). The RI shows that this groundwater contamination does not originate from Site 7 or 14, but is associated with Site 24, the VOC Source Area. As a result, groundwater cleanup will be addressed in the Proposed Plan and ROD for Sites 18 and 24. The remedy may include use restrictions that prohibit drilling of wells and/or extraction of groundwater and allow access for groundwater monitoring and maintenance of equipment associated with groundwater remediation.

After review of the draft ROD, DTSC has the following comments:

1. DTSC has not received a copy of the Responsiveness Summary that addresses comments submitted regarding the Proposed Plan. Upon receipt and review of the Responsiveness Summary, DTSC may have additional comments to the draft ROD.

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2. Section 1.3, Lead and Support Agencies, Page 1-1: The second paragraph states, "The primary support agency is the United States Environmental Protection Agency . . ."

Revise this paragraph to clarify that the United States Environmental Protection Agency (EPA), DTSC and the Regional Water Quality Control Board (RWQCB) are regulatory agencies.

3. Section 2, Site History and Enforcement Activities, Page 2-2: The second paragraph on the page states, "The BCT's (Base Realignment and Closure Cleanup Team's) mission is fast-track remediation of MCAS El Toro, to promote reuse and protect human health and the environment, by working cooperatively with the BCT, the community, and the shareholders."

Please revise "shareholders" to "stakeholders."

4. Section 2, Site History and Enforcement Activities, Page 2-3: The second to the last paragraph on the page states, "Subsequent to the Phase II RI, an evaluation of metals in groundwater was performed (BNI 1999a). The purpose of this evaluation was to determine whether the reported concentrations of metals in groundwater at MCAS El Toro reflect ambient conditions or are the result of historical Station activities."

The citation refers to the *Draft Final CERCLA [Comprehensive Environmental Response, Compensation and Liability Act] Groundwater Monitoring Plan, Marine Corps Air Station El Toro, California*, which does not include an evaluation of metals concentrations in groundwater. DTSC does not recall receiving a report regarding this evaluation. If this evaluation was conducted, please provide this office with additional information to locate the associated report. If this paragraph is in error, please revise the text as necessary.

5. Section 5.1.2, Surface Hydrology, Page 5-7: The last sentence in this section states, "The completion of the Orange County San Diego Creek Flood Control Master Plan is expected to alleviate the flood hazard by 2001 (SWDIV 1998)."

A reference for the citation, SWDIV 1998, is not included in Section 10, References, revise as necessary.

6. Section 5.2.3.1, RCRA [Resource Conservation and Recovery Act] Facilities Assessment: "The visual evaluation of both SWMUs [solid waste management units] during the Phase II RI fieldwork did not identify evidence of a surface release at either location (BNI 1997a). As a result, SWMUs/AOCs [areas of contamination] 71 and 72 are recommended for no further action."

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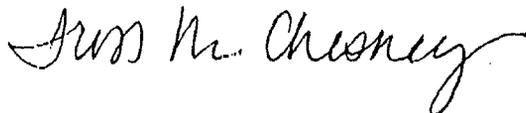
DTSC received a summary report for SWMU 71 and concurred with the proposed no further action station since the area is located within the investigation boundaries of IRP Site 7. DTSC understands that the DON intends to submit a similar for SWMU 72. For clarification, provide this additional detail in the text.

7. Section 7.5, Risk Characterization Results, Page 7-10: The last bulleted item on the page states, "Manganese was the largest contributor to noncancer risk."

The human-health risk assessment was included in the *Final Phase II Remedial Investigation Report, Attachments O and P, Operable Unit-3B, Sites 7 and 14, Marine Corps Air Station El Toro, California* (RI report), prepared by Bechtel National, Inc., dated March 2000. Page O6-58 of the RI report states, "For inhalation exposures the RfD [reference dose] values used have an additional uncertainty because they represent only the adult receptor. The inhalation RfDs were estimated from inhalation reference concentrations (RfC) by integrating the adult body weight and Inhalation rate. The resultant adult RfD is also used to estimate the noncancer risk for a resident child. Use of an adult RfD overestimates the resultant hazard to a child. Hence, the uncertainty associated with the child's HI should be considered in risk management decisions." It is recommended that this information be incorporated in the discussion for manganese to further illustrate the conservative nature of the estimated hazard index value.

Please contact me at (714) 484-5395 if you have any questions.

Sincerely,



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Enclosure

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