

Incoming file

Department of Toxic Substances Control



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MCAS EL TORO
SSIC #5090.3

January 22, 2001

Mr. Dean Gould
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Base Realignment and Closure
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DRAFT BASE REALIGNMENT AND CLOSURE (BRAC) BUSINESS PLAN, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above report (Business Plan) dated December 2000. The Business Plan presents the status of the environmental restoration and compliance programs at MCAS El Toro as of December 31, 2000. The Business Plan is concise alternative to the BRAC Cleanup Plan (BCP) published from 1994 through 1999. In general, the document is well-written and effectively presents the program status.

After review of the draft Business Plan, DTSC has the following comments:

1. Introduction, Page 1: The last paragraph in this section states, "MCAS El Toro was listed on the National Priority List under CERCLA [Comprehensive Environmental Response, Compensation and Liability Act] in February 1990."

For clarification, add a description of the Federal Facility Agreement, including the purpose and signatories.

2. Status of Disposal, Reuse, and Interim Lease Process, Page 3: The last two paragraphs on this page mention "The expiration of the cooperative agreement for caretaker services was concurrent with the execution of a Master Lease, effective 31 August 2000" and the Finding of Suitability to Lease (FOSL) prepared to support the interim lease with the County of Orange.

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For clarity, include information regarding the scope, purpose, term of both the interim and master lease and how the two relate to each other. Also describe that FOSLs were prepared to support each of the leases.

For completeness, include information regarding the Federal Agency-to-Agency transfer of the habitat area, including Sites 2 and 17, to the Federal Aviation Administration.

3. Exhibit 2, Location of Concern Distribution: Verify the numbers shown in the exhibit. In some cases, the number of sites requiring further action and those requiring no further action do not add up to the total number of sites. Also, the total number shown for Underground Storage Tank (UST) sites and Aboveground Storage Tank (AST) sites do not add up to the total number shown for Storage Tank sites.
4. Exhibit 2, Location of Concern Distribution: For the different types of Miscellaneous sites listed, indicate the number of sites that require further action and/or no further action.
5. Exhibit 3, Distribution of 881 LOCs [Locations of Concern], Page 6: This exhibit shows the total number of each type of LOC, the number of each type of LOC that requires no further action, and the difference between the numbers. The difference is identified as "NFA Decision Documents in Review or In Development."

Revise the exhibit to show that the difference between the numbers is actually the number of LOCs that require further action, rather than indicating that all of the remaining LOCs have been determined to require no further action.

6. Historical Environmental Program Highlights, Page 6: This section should include Agency concurrence on the OU-3 ROD for Site 11.
7. Installation Restoration Program, Page 7: The last sentence in the first paragraph states, "The following is a brief summary of the site groupings, current status, and FAA schedule for each of the three OUs."

Revise "FAA" to "FFA" to reflect the schedule identified in the Federal Facility Agreement.

8. Installation Restoration Program, OU-2A, Page 7: This section states, "The interim ROD (vadose zone) for Site 24 was signed in September 1997, implementation of the final remedy - SVE treatment - commenced in 1999, and

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remediation and confirmation sampling of the vadose zone was completed in 2000."

DTSC understands that the Department of the Navy has conducted confirmation sampling of the vadose zone at Site 24; however, a document presenting this information has not been submitted and has not received regulatory agency concurrence. As a result, remediation was not completed in 2000. Please clarify this statement.

9. Installation Restoration Program, OU-2B, Page 8: The last sentence in this section states, "The Draft ROD was submitted in October 1998 to the BCT for review, and the Final Interim ROD was signed in July 2000."

Include information regarding the content of the Interim ROD and how it will differ from the Final ROD. Also note that throughout the document, the Interim ROD for Sites 2 and 17 is referenced as the "Interim ROD," "Final Interim ROD," or "Draft Final Interim ROD." For clarity, it is recommended that one term be used throughout the document.

10. Installation Restoration Program, OU-3, Page 8: It is recommended that descriptions for the OU-3 sites that require further action or assessment include the same detail as the sites included in OU-2A and OU-2B. For example, approximate area of site, suspected types of waste, dates of significant documents, etc.
11. Compliance Program Sites and Other LOCs, Page 9: The numbers listed in the Status of AST, APHO, RFA and OWS sites do not correlate to those shown on Exhibit 2.
12. Planned Goals for Year 2001, Page 14: According to the most recent revision of the FFA schedule, forwarded on January 17, 2001, the following activities are scheduled to be completed during the year 2001:
- The Proposed Plan (PP) for Sites 18 and 24 will be released for public comment.
 - The draft ROD for Sites 18 and 24 will be issued.
 - The PP for Site 16 will be released for public comment.
 - The draft ROD for Site 16 will be issued

For consistency, incorporate these activities into the "Planned Goals for Year 2001."

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13. Figure 10, Temporary Accumulation Area [TAA] Locations: Locations of TAA sites are shown by an "x" and some do not have an associated designation. Please verify the TAA sites and designations.
14. Figure 12, Other Locations of Concern: Add descriptions for PCB A1 and PCB A2. Also, MSC D1 is identified as requiring no further action in Table 2. Update the designation of this site accordingly.
15. Figure 16, Potential Radiological Survey Sites: Add the listed descriptions to the following potential radiological survey sites to be consistent with information presented in the *Draft Radiological Survey Plan*, prepared by Roy F. Weston, Inc., dated July 2000.
 - Building 243 Complex: Command Museum (Buildings 242, 243 and 244).
 - Site 8: DRMO Storage Yard 1 (Site 8) and 2 (AOC 264).
 - Site 5: Site 5 and APHO 46.
 - Site 17: Site 17 and APHO 44.
 - APHO 38: Nuclear, Biological and Chemical Buildings (Buildings 787, 1789 and 1803) and APHO 38.

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

Sincerely,



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