



OFFICE OF

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MCAS EL Toro
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RE: Marine Corps Air Station El Toro Uncontaminated Property
Identification

Gentlemen,

Your letter dated November 11, 1994 requested EPA's concurrence on the Navy/Marine Corps' "uncontaminated" property determination for Marine Corps Air Station (MCAS) El Toro in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 120(h)(4). Section 120(h)(4) was added to CERCLA as part of the Community Environmental Response Facilitation Act (CERFA). Additional information was received March 21, 1995 which clarified your identification.

Based on our review of the draft Environmental Baseline Survey (EBS) dated November 11, 1994, the MCAS El Toro Installation Restoration Program CERFA Technical Memorandum dated March 1, 1995, the Navy/Marine Corps' draft Responses to EPA Comments on the draft EBS received on March 21, 1995, a revised draft Map of Proposed CERFA-Eligible Areas received on March 21, 1995, and without any independent investigation or verification of the information contained therein, the undersigned concurs, as provided below, in the uncontaminated areas as identified in the Map entitled "Figure 1, Proposed CERFA-Eligible Areas, MCAS El Toro" submitted by the Navy/Marine Corps in accordance with the provisions of Section 120(h)(4)(A) of CERCLA. The review of the EBS and supplemental

information was undertaken pursuant to Section 120(h)(4)(B) and the sole purpose of the concurrence is to satisfy the requirements of that provision. The undersigned expressly reserves all rights and authorities relating to information not contained in the EBS, whether such information is known as of this date, or is discovered in the future.

Your letter dated November 11, 1994 also requested EPA's concurrence on areas that cannot be considered uncontaminated pursuant to CERCLA Section 120(h)(4) but may be considered eligible for transfer. The purpose of this letter is to satisfy the requirements of Section 120(h)(4)(A) of CERCLA only. Concurrence from EPA on other areas that may be eligible for transfer will be provided during the review process of the Finding of Suitability to Transfer and Finding of Suitability to Lease documents.

Discussions with the Navy/Marine Corps, EPA, and the State of California have resulted in revisions to the identification of uncontaminated property provided by the Navy/Marine Corps on November 11, 1994. These revisions have been documented in "Figure 1, Proposed CERFA-Eligible Areas, MCAS El Toro" and in the Response to EPA Comments received by EPA on March 21, 1995.

For clarification purposes, the undersigned notes that some Locations of Concern (LOCs) identified as uncontaminated in the draft EBS (Table 4-2) dated November 11, 1995 were not identified as uncontaminated by the Navy/Marine Corps in the March 21, 1995 submittals because they overlie groundwater contamination as represented in "Figure 1, Proposed CERFA-Eligible Areas" received on March 21, 1995. The following LOCs were not identified as uncontaminated: SWMU/AOC 74, 178, 210, 216, 268, 299, 304, 306, & 274 (petroleum products are stored at 274). In addition, SWMU/AOC 141, originally identified as uncontaminated in the draft EBS, was not identified as uncontaminated by the Navy/Marine Corps in the March 21, 1995 submittals because it is within a non CERFA-eligible area of the airfield.

Also, for clarification purposes, the undersigned notes that the current and former ordnance storage bunkers originally identified as uncontaminated in the draft EBS were not identified as uncontaminated by the Navy in the March 21, 1995 submittals because of the storage of hazardous substances (ordnance) that occurred at these bunkers.

Property identified as uncontaminated may have had pesticides or herbicides containing hazardous substances applied on it. In addition, lead-based paint, asbestos, or household products

containing hazardous substances may have been present on this property. Further, some of this property may have been impacted by releases of petroleum products as evidenced by stained pavement. We have concluded that the property that we are concurring on can be considered uncontaminated pursuant to CERCLA 120(h)(4) because the information provided by the Navy does not indicate that any levels of hazardous substances or petroleum products on this property pose a threat to human health or the environment.

We would like to commend the Navy for its cooperation with us and the State of California in making the CERFA identification process successful.

If you would like to discuss the details of this letter, please call John Kemmerer, Chief, Base Closure Programs, at 415-744-2241.

Sincerely,

Julie Anderson, Director
Federal Facilities Cleanup Office

cc: David Wang, CAL EPA