

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

on 4
West Broadway, Suite 425
Long Beach, CA 90802-4444

(310) 590-4868

M60050.001301
MCAS EL TORO
SSIC # 5090.3



November 17, 1995

CTO-059/00026

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

REVIEW COMMENTS ON THE DRAFT FINAL ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR SITES 4, 7, 11, 13, 14, 19 AND 20. AT MARINE CORPS AIR STATION (MCAS) EL TORO

The Department of Toxic Substances Control (DTSC) received the subject documents on October 20, 1995 and has completed its review of the following Engineering Evaluations/Cost Analysis Reports:

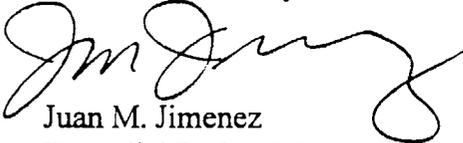
- ▶ Site 4, Unit 2 Ferrocene Spill Area
- ▶ Site 7, Unit 1 Former Drop Tank Storage Area No. 2
- ▶ Site 11, Units 1 and 2 Former Transformer Storage Area
- ▶ Site 13, Former Oil Change Area
- ▶ Site 14, Former Battery Acid Disposal Area
- ▶ Site 19, Aircraft Expeditionary Refueling Site
- ▶ Site 20, Units 2 and 3, Hobby Shop

The DTSC and Regional Water Quality Control Board, Santa Ana Region comments are enclosed. Overall the comments were satisfactorily addressed. The main issue is the use of background levels developed for the Phase II Work Plan during the Data Quality Objectives (DQOs) phase of the investigation back in 1993. Cleanup levels should be developed and agreed to prior to the implementation of the EE/CAs. See the general comments.

Mr. Joseph Joyce
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The DTSC will be available for a comment resolution meeting(s) either in person or via a telephone conference as necessary. We look forward to working with you on these and other issues. Feel free to contact me at (310) 590-4919.

Sincerely,



Juan M. Jimenez
Remedial Project Manager
Region 4 - Base Closure Unit
Office of Military Facilities

Enclosures

cc: Ms. Bonnie Arthur
U. S. Environmental Protection Agency
Region IX
Hazardous Waste Management Division, H-9-2
75 Hawthorne Street
San Francisco, California 94105-3901

Mr. Lawrence Vitale
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
2010 Iowa Avenue, Suite 100
Riverside, California 92507-2409

Mr. David Cowser
Bechtel National, Inc.
401 W. "A" Street, Suite 1000
San Diego, California 92101-7905

Mr. Vish Parpiani
Environmental and Safety
Marine Corps Air Station-El Toro
P. O. Box 95001
Santa Ana, California 92709

GENERAL COMMENTS FOR ALL EE/CAS

1. Page 1 of 4, Mr. Michael J. Wade, Ph.D., D.A.B.T. Is employed by the Department of Toxic Substances Control not the California Regional Water Quality Control Board as specified.
2. Page 4 of 4, Dr. Wade's 3rd Item: The above mentioned item has not been satisfactorily addressed. Mr. Joseph Joyce, Ms. Bonnie Arthur and myself have tentatively agreed to have a phone conference on November 22, 1995 at 1:00 PM. To discuss the evaluation of the technical issue of background. This evaluation will take advantage of the data which was collected subsequent to the original estimate. It is the DTSC position that the metals listed in Table 2-1 are not representative and could be better defined using techniques developed by the Navy as discussed in our earlier comments. In addition, the cleanup levels need to be agreed upon before the removal action takes place.
3. General Comment: The RAC should notify the DTSC and the Regional Water Quality Control Board of proposed field activities at least two weeks in advance in order to observe the activities spelled out in the EE/CAs. Such activities should include but not be limited to: excavation, confirmation sampling for both the treated, excavated and confirmation sampling events.

State of California

Memorandum

To: Mr. Juan M. Jimenez **Date:** October 23, 1995
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, CA 90802-4444

From: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION
2010 IOWA AVENUE, SUITE 100, RIVERSIDE, CALIFORNIA 92507-2409
Telephone: CALNET 632-4130 Public (909) 782-4130

Subject: Draft Final Engineering/Cost Analysis (EE/CA) For Sites, 4, 7,
11, 13, 14, Unit 2 of 19, and Site 20 For Marine Corps Air
Station El Toro

We have reviewed the subject documents dated September 1995 and received by us on October 10, 1995. As a result of our review we have no significant comments.

If you have any questions, please call me at (909) 782-4998.

Lawrence Vitale

Lawrence Vitale
DoD Section