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MCAS EL TORO  
SSIC # 5090.3

### CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-92-D-4670

Document Control No.: CTO-0103/0062

File Code: 0222

TO: Commanding Officer  
Naval Facilities Engineering Command  
Southwest Division  
Mr. Paul Kennedy, Code 0233.PK (1 copy)  
Building 128  
1220 Pacific Highway  
San Diego, CA. 92132-5187

DATE: March 8, 1996  
CTO #: 0103  
LOCATION: MCAS El Toro

FROM: [Signature]  
E. K. Cowser, Project Manager

[Signature]  
J. W. Kluesener, Operations Manager

DESCRIPTION: Response to Comments, Draft BRAC Cleanup Plan  
DTD January 19, 1996; February 13, 1996; and February 15, 1996

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CLEAN II Program  
Bechtel Job No. 22214  
Contract No. N68711-92-D-4670  
File Code: 0222

**IN REPLY REFERENCE:** CTO-0103/0062

March 8, 1996

Commanding Officer  
Naval Facilities Engineering Command  
Southwest Division  
Mr. Paul Kennedy, Code 0233.PK  
Building 128  
1220 Pacific Highway  
San Diego, CA 92132-5187

**Subject:** Responses to Comments, Draft BRAC Cleanup Plan

Dear Mr. Kennedy:

Enclosed are the responses to comments on the Draft BRAC Cleanup Plan (BCP) for Marine Corps Air Station, El Toro, dated 16 January 1996. As indicated in the enclosed, changes have been incorporated into the Final BCP, dated 1 March 1996. U.S. EPA did not submit comments.

If you have any questions, please do not hesitate to contact me at (619) 687-8802.

Very truly yours,

Dave K. Cowser  
Project Manager

**Enclosures:** Response to Comments, Draft BCP, MCAS El Toro from Lt. Hope Katcharian, Director, Environmental Division, MCAS El Toro.  
Response to Comments, Draft BCP, MCAS El Toro from Edward Rumsey, Director, Engineering Division, MCAS El Toro.  
Response to Comments, Draft BCP, MCAS El Toro from Lynn Hornecker, Remedial Project Manager, SWDIV.  
Response to Comments, Draft BCP, MCAS El Toro from Tayseer Mahmoud, Remedial Project Manager, Cal-EPA, DTSC.  
Response to Comments, Draft BCP, MCAS El Toro from Larry Sievers, RAB Member.



**Bechtel National, Inc.** Systems Engineers-Constructors

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<b>Originator:</b> Lt. Hope Katcharian, Director, Environmental Division MCAS El Toro, California	<b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0062 File Code: 0222
<b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro, California	
<b>Date:</b> 19 January, 1996	
<b><u>GENERAL COMMENTS</u></b>	<b><u>RESPONSE TO GENERAL COMMENTS</u></b>
1. Please modify Table 3-7 of the most recent draft to reflect the closure letters enclosed. Tank status for the listed tanks is now "closed" and the comment columns should indicate no further action required.	<b>RESPONSE 1:</b> Comment incorporated into the final BCP. Text in Table 3-7 has been revised to reflect closure of listed tanks. Comments column indicates that no further action is required for the listed tanks.
2. Additionally, 32 former UST sites numbered 5201-5209, 5213-5219, 5224-5236, 5239, and 5241-5242 were approved for permanent closure by Ms. Arghavan Rashidi-Fard of the Orange County Health Care Agency. I will submit copies of the closure letter when I receive it. In the meantime, I believe that we can also list these sites as closed for the purposes of the March 1996 BCP without fear of error.	<b>RESPONSE 2:</b> Comment incorporated into the final BCP. Status of 32 former UST sites were revised to reflect closure.

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Edward J. Rumsey, MCAS El Toro Director, Engineering Division MCAS El Toro, California</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro, California</p> <p><b>Date:</b> 13 February, 1996</p>	<p><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0062 File Code: 0222</p>
<p><b><u>GENERAL COMMENTS</u></b></p>	<p><b><u>RESPONSE TO GENERAL COMMENTS</u></b></p>
<p>1. Page 3-9, Section 3.2.1.1, second bullet. Does this include the 30+ UST tanks removed from NAMAR, etc.?</p>	<p>RESPONSE 1: Text has been revised to reflect additional tank locations.</p>
<p>2. Page 3-9, Section 3.2.1.1, third bullet. Total UST locations reduced for BNI and OHM's efforts as well as NAMAR, etc.</p>	<p>RESPONSE 2: Text has been revised to reflect current number of tank locations.</p>
<p>3. a. Page 3-9, Section 3.2.1.1, last paragraph. Delete "Operation and". Sentence should now read, "Maintenance activities for USTs are the responsibility of Chief of Staff (AC/S) Installations Department."  b. Insert sentence, "Operational responsibilities are split amongst [sic] station organizations and tenants," after "Chief of Staff (AC/S) Installations Department."</p>	<p>RESPONSE 3: a. Comment incorporated into the final BCP. Text has been revised to reflect changes.  b. Comment incorporated into the final BCP. Text has been revised to reflect changes.</p>
<p>4. Page 3-12, Section 3.2.1.3, first paragraph. Fuel Supply pipelines not shown in Figures 3-2c and 3-2d.</p>	<p>RESPONSE 4: Comment incorporated into the final BCP. Fuel Supply pipelines have been added to Figures 3-2c and 3-2d.</p>
<p>5. Page 3-12, Section 3.2.1.3, third paragraph. Three USTs (902A, 902B, and 902C), didn't see these three tanks on the UST maps.</p>	<p>RESPONSE 5: Comment incorporated into the final BCP. Three USTs (902A, 902B, and 902C) have been identified as active on the UST maps.</p>
<p>6. Page 3-28, Section 3.2.11, first and second paragraph. I thought 1978 was the year guidance has us test 1978 and prior housing.</p>	<p>RESPONSE 6: Comment noted. The date has been left unchanged because confirmation from the 22 March 1992 policy letter could not be made. This comment will be addressed in future BCPs.</p>
<p>7. Page 3-29, Section 3.2.11, last two paragraphs. The number for detached housing facilities is too small. We have 1700+ units total, most of which are detached. Housing Manager is Mr. Hal Wise at extension 6701.</p>	<p>RESPONSE 7: Comment incorporated into the final BCP. The total number for housing facilities has been revised to reflect current information.</p>
<p>8. Page 3-30, Section 3.2.11, last sentence, first two bullets. Rewrite this, depends upon reuse.</p>	<p>RESPONSE 8: Comment incorporated into the final BCP. Text has been revised to reflect that abatement requirements depend upon reuse.</p>

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MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Edward J. Rumsey, MCAS El Toro Director, Engineering Division MCAS El Toro, California</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro, California</p> <p><b>Date:</b> 13 February, 1996</p>	<p><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0062 File Code: 0222</p>
<p>9. Page 4-5, Section 4.2.1.1, second bullet. Revise text to read, "If USTs are needed in the future under a reuse scenario for the property, new double-walled USTs would eventually need to be installed <u>by the reuse agency.</u>"</p>	<p><b>RESPONSE 9:</b> Comment incorporated into the final BCP. Suggested text has been inserted.</p>
<p>10. Page 4-7, Schedule Assumptions. Delete "Sixty-four USTs." Sentence should now read, "They are considered essential for base operations through the closure date of July 1999."</p>	<p><b>RESPONSE 10:</b> Comment incorporated into the final BCP. Text has been revised.</p>
<p>11. Page 4-9, Section 4.2.4.1, first bullet. Delete last sentence, "This release need to be further evaluated to determine if PCBs have been released from the transformer."</p>	<p><b>RESPONSE 11:</b> Comment incorporated into the final BCP. Text has been deleted.</p>
<p>12. Page 4-13, Section 4.2.11, Lead-Based Paint. Delete "and potential reuse of the building. Removal of LBP for reuse activities has not been considered to date." Insert, "No abatement of LBP in/on non-residential structures is anticipated." (Cleanup up wording)</p>	<p><b>RESPONSE 12:</b> Comment incorporated into the final BCP. Text has been deleted. Additional text has been added to reflect that abatement of LBP is not anticipated for non-residential structures.</p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Lynn Hornecker, Remedial Project Manager, Compliance Program Issues Southwest Division, Naval Facilities, San Diego, CA</p> <p><b>To:</b> DeAnna Dunbar, Remedial Project Manager Department of the Navy, San Diego, CA</p> <p><b>Date:</b> 15 February, 1996</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0062 File Code: 0222</p>
<p><b><u>GENERAL COMMENTS</u></b></p> <p>1. Please consider adding or modifying the following information in Table 3-7:</p> <ul style="list-style-type: none"> <li>a) Add to Comment field: UST Site 461 coincides with the location of OWS 461A (active).</li> <li>b) Add to Comment field: UST Site 462 coincides with the location Of OWS 462A (active).</li> <li>c) Add to Further Action field: UST 398-Free product (JP-5) recovery to continue in 1996.</li> <li>d) General Comments: If practicable, please delete all references to Technical Direction Letters (TDL) and COTR Transmittals in the Future Action field.</li> <li>e) General Comment: Former IRP Sites 15, Unit 1 and 19, Unit 1 are being addressed for closure under the LUFT program and are included in Contract N68711-93-D-1459, DO #24. These sites could be added to the table for tracking purposes.</li> </ul>	<p><b><u>RESPONSE TO GENERAL COMMENTS</u></b></p> <p><b>RESPONSE 1:</b></p> <ul style="list-style-type: none"> <li>a) Comment incorporated into the final BCP.</li> <li>b) Comment incorporated into the final BCP.</li> <li>c) Comment incorporated into the final BCP. Additional text reflects continued free-product recovery in 1996.</li> <li>d) Comment incorporated into the final BCP. All references to Technical Direction Letters (TDL) and COTR Transmittals has been deleted from the Future Action field in Table 3-7.</li> <li>e) This information does not appear in Table 3-7 of the final BCP. However, the UST database which will be maintained by Station personnel has been updated to reflect this change. Future BCPs will also include this information.</li> </ul>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Tayseer Mahmoud, Remedial Project Manager Cal-EPA, Department of Toxic Substances Control (DTSC), Office of Military Facilities</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro, California</p> <p><b>Date:</b> 15 February, 1996</p>	<p><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0062 File Code: 0222</p>
<p><b><u>SPECIFIC COMMENTS</u></b></p> <p>1. Page ES-7, Initiatives for Accelerating Cleanup, Executive Summary  In the paragraph beginning with "Technology Review," the latest revision of the Treatment Technologies Application Matrix for Base Closure Activities is dated November <u>1994</u>.</p>	<p><b><u>RESPONSE TO SPECIFIC COMMENTS</u></b></p> <p>RESPONSE 1: Comment incorporated into the final BCP.</p>
<p>2. Chapter 1, Figure 1-2, Location of past Hazardous Substance Activities  Legend item number 6 should be listed as Explosive <u>Ordnance</u> Disposal.</p>	<p>RESPONSE 2: Comment incorporated into the final BCP.</p>
<p>3. Chapter 2, Page 2-3, The paragraph beginning with "The final MCAS El Toro EBS report..."</p> <p>a. To maintain consistency with Department of navy guidance and the DoD BRAC Cleanup Plan, we recommend that the acronym "ECP" for Environmental Condition of Property be used instead of "BCP." See attached copy of MCAS Tustin BCP Abstract for an example.</p> <p>b. Only U.S. EPA can concur on CERFA nominated property at NPL sites. We recommend that the last sentence be revised to state that U.S. EPA concurred with the identification of ECP Area Type 1 as CERFA eligible. Cal-EPA agreed with U.S. EPA's decision.</p>	<p>RESPONSE 3:</p> <p>a. Comment incorporated into the final BCP. All "BCP Area Type" references have been changed to be consistent with this comment.</p> <p>b. Comment incorporated into the final BCP.</p>
<p>4. Chapter 2, Page 2-4, Section 2.2 Relationship to Environmental Programs</p> <p>We recommend the following changes to the first paragraph on this page: <i>MCAS El Toro property may be transferred to other federal agencies or nonfederal parties. Transfers of federal property to nonfederal parties are governed by CERCLA <u>120(h)</u>, as amended by CERFA in 1992. However, transfers between federal agencies are exempt from covenants requiring environmental response action, CERCLA <u>(120(h)(B))</u>.</i></p>	<p>RESPONSE 4: Comment incorporated into the final BCP.</p>

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<p><b>Originator:</b> Tayseer Mahmoud, Remedial Project Manager Cal-EPA, Department of Toxic Substances Control (DTSC), Office of Military Facilities</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro, California</p> <p><b>Date:</b> 15 February, 1996</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0062 File Code: 0222</p>
<p><b>5. Chapter 3, Page 3-3, Second paragraph</b></p> <p>The BCP should use the acronym “ECP” instead of “BCP” when referring to the Department of Defense Environmental Condition of Property Category Types. We recommend that the paragraph be revised as follows:</p> <p><i>An evaluation of current environmental status at MCAS El Toro is also discussed. Real property was assigned one of seven Department of Defense Environmental Condition of Property (ECP) category types, which identify the environmental condition of the property. The BCP guidebook defines the seven area types as follows:</i></p> <ul style="list-style-type: none"> <li>• <i>ECP Area Type 1 - Areas where no storage, release, or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).</i></li> <li>• <i>ECP Area Type 2 - Areas where only storage of hazardous substances or petroleum products has occurred (but no release, disposal, or migration from adjacent areas has occurred).</i></li> <li>• <i>ECP Area Type 3 - Areas where storage, release, disposal, and/or migration of hazardous substances or petroleum products have occurred, but at concentrations that do not require a removal or remedial action.</i></li> <li>• <i>ECP Area Type 4 - Areas where storage, release, disposal, and/or migration of hazardous substances or petroleum products has occurred, and all remedial actions necessary to protect human health and the environmental have been taken.</i></li> <li>• <i>ECP Area Type 5 - Areas where storage, release, disposal, and/or migration of hazardous substances or petroleum products has occurred, removal and/or remedial actions are underway, but all required remedial actions have not yet been taken.</i></li> <li>• <i>ECP Area Type 6 - Areas where storage, release, disposal, and/or migration of hazardous substances or petroleum products has occurred, but required response actions have not yet been implemented.</i></li> <li>• <i>ECP Area Type 7 - Areas that are unevaluated or require additional evaluation.</i></li> </ul>	<p><b>RESPONSE 5:</b> Comment incorporated into the final BCP. All “BCP Area Type” references have been changed to be consistent with this comment.</p>

**RESPONSE TO COMMENTS  
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MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Larry Sievers Restoration Advisory Board Member Booz Allen &amp; Hamilton, San Bernardino, California</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro, California</p> <p><b>Date:</b> 15 February, 1996</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0062 File Code: 0222</p>
<p><b><u>SPECIFIC COMMENTS</u></b></p> <p>1. Page ES-1, Section: Executive Summary. In detail define and explain what an LOC is and what its significance is. How does an LOC encumber property. How does it interrelate with things we read about later like SWMU/AOC, USTs, asbestos, etc. A lot of questions/comments I have centered around or are associated with LOCs.</p> <p>2. Page ES-2, Section: Executive Summary. This document should have a plan to remedy each of these 800 LOCs as soon as practical to facilitate transfer. The graph showing the distribution of LOCs is very good.</p> <p>3. Page NA, Section: Executive Summary. Is an LOC, still an LOC if it is a No Further Action? Since it [sic] confusing to say that there are 800 LOCs---when a number of the sites are NFA, I'd suggest when the LOCs are first discussed it be stated that TBD% [sic] are NFA. That way we understand that some of the LOCs will not impact reuse and require NFA. The [sic] MCAS El Toro can get credit for LOCs they have closed out.</p> <p>4. Page ES-6, Section: Exhibit ES-4. The reuse of UST sites relies partly upon formal regulatory closure of the site. This should be incorporated into this figure.</p> <p>5. Figure 1-1. Include the major roads to the east of the base and the portion of Irvine Blvd. that runs through Station property to this figure for completeness.</p>	<p><b><u>RESPONSE TO SPECIFIC COMMENTS</u></b></p> <p>RESPONSE 1: The definition of LOC has been included in the executive summary. An LOC is defined in the text as "any identified location or area that is potentially contaminated or is a potential source of contamination." This definition therefore includes IRP Sites, SWMUs/AOCs, less-than-90-day accumulation areas, USTs, ASTs, PCB transformers, PCB storage areas, OWSs, RCRA facilities, burn pits, pesticide storage areas, aerial photograph sites, silver recovery units, possible landfills, the Desert Storm waste storage area, and fuel supply lines.</p> <p>RESPONSE 2: Given the definition of LOCs, the BCP is the plan to address all LOCs at the Station. Specifically, Chapters 3 and 4 address each type of LOC and discuss the status of and strategy for environmental programs at El Toro.</p> <p>RESPONSE 3: Since LOCs include areas that are potentially contaminated, not all LOCs require action. However, it is still important to document that a location or area has been designated as an LOC. Therefore, the number of LOCs at the Station can only increase. Any "credit" that the Station gets from closing out LOCs does not appear as a reduction in the number of LOCs. The Station takes credit for closing out LOCs in the BCP, specifically in Chapter 3 (and in other documents).</p> <p>RESPONSE 4: At the time the draft document was issued, no UST sites had been closed. For the final document, closure information has been included in the text, Table 3-7, UST location maps and in Exhibits ES-4 and 3-2.</p> <p>RESPONSE 5: No geographical information system (GIS) data was available soon enough to incorporate this comment. The 1997 BCP should include the updated figure.</p>

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MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Larry Sievers Restoration Advisory Board Member Booz Allen &amp; Hamilton, San Bernardino, California</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro, California</p> <p><b>Date:</b> 15 February, 1996</p>	<p><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0062 File Code: 0222</p>
<p>6. Figure 1-4. Legend area G (acquisition year 1966) does not correspond with Table 1-5 which states 1986 as the acquisition time.</p>	<p><b>RESPONSE 6:</b> 1986 is the correct acquisition date. Figure 1-4 has been changed to reflect the correct date.</p>
<p>7. Figure 1-5. This figure is not consistent with Table 1-6, it does not show the Big Bear parcel. Author's note Big Bear is my home town and I like to see it on maps. In fact I have traveled past the property many times and worked just down the road from it.</p>	<p><b>RESPONSE 7:</b> The Big Bear parcel does not appear on Figure 1-5 because the property is not owned by the Marine Corps. As stated in the text (p. 1-10), the Marine Corps owns the facilities on the land, but the land is owned by the U.S. Forest Service.</p>
<p>8. Page 2-1, Section: Chapter 2. It should be stated that although 63% of the base is Category 1, the remaining property regardless of BCP Category is transferable by lease on a case by case basis. The current text almost reads as if only this 63% is available for transfer.</p>	<p><b>RESPONSE 8:</b> According to DoD, only land of area types 1-4 are eligible for transfer by deed. The 63% of land mentioned on page 2-1 refers to land that has been designated as "uncontaminated" and that is eligible for transfer under CERFA.</p>
<p>9. Page 2-3, Section 2.1. Why is a CRP needed for a FOST (?) [sic], this requirement seems unnecessary.</p>	<p><b>RESPONSE 9:</b> A Community Reuse Plan (CRP) is required for a Finding of Suitability for Transfer (FOST) so that conflicts in reuse with adjacent parcels and areas are resolved before land is transferred.</p>
<p>10. Page 2-3, Section 2.1. Again, lets not say 800 LOCs with saying that TBD [sic] are NFA.</p>	<p><b>RESPONSE 10:</b> Based on RESPONSE 1 and RESPONSE 2, no change has been made as a result of this comment.</p>
<p>11. Page 3-3. The text states that BCP Categories 5-7 require additional work prior to transfer. More accurately, any category of property is subject to transfer by lease on a case-by-case basis.</p>	<p><b>RESPONSE 11:</b> While it may be true that land of any area type may be transferred by lease on a case-by-case basis, land of area types 5-7 may only be transferred by deed after additional investigation and/or remediation has occurred.</p>
<p>12. Page 3-9, Section 3.2.1.1. A summation of the BCP Category types should be included here (i.e. 29 USTs were considered Category 2, etc.).</p>	<p><b>RESPONSE 12:</b> Area type designations for USTs (or any other LOCs) are not used to direct or focus cleanup, per se. A summation of this information has not been included. The information on UST area types can be obtained from Table 3-7.</p>
<p>13. Page 3-9, Section 3.2.1.1. How many USTs are closed through the county and/or RWQCB?</p>	<p><b>RESPONSE 13:</b> At the time the draft BCP was submitted, no tank sites had been identified as closed. The final BCP includes revised information about 41 tank sites that have been closed.</p>

**RESPONSE TO COMMENTS  
DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Larry Sievers Restoration Advisory Board Member Booz Allen &amp; Hamilton, San Bernardino, California</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro, California</p> <p><b>Date:</b> 15 February, 1996</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0062 File Code: 0222</p>
<p><b>14. Page 3-9, Section 3.2.11. Third bullet, 290 is a big number, it should be broken down according to the categories discussed; no evaluation, values above detection, but below LUFT, and results pending.</b></p>	<p><b>RESPONSE 14:</b> Information required to address this comment is not available at this time. This comment will be considered in future BCPs.</p>
<p><b>15. Page 3-11, Section 3.2.11. The information representing tank 398 conditions appear [sic] to be old, from a 1993 report which probably means the data may be older than that. Is 1993 data the best available information?</b></p>	<p><b>RESPONSE 15:</b> The latest GIS information available on contaminant plume contours comes from the 1993 report. Other information on progress at tank 398 is current.</p>
<p><b>16. a. Page 3-11, Section 3.1.1.1. Second set of bullets, first bullet states 9 site closures approved by RWQCB, the UST Table does not reflect which 9 tanks.</b></p> <p><b>b. Second set of bullets, first bullet states that the RWQCB approved the closure. Earlier the document stated that the closure of USTs at MCAS El Toro goes through the county. Is it both, or one or the other?</b></p>	<p><b>RESPONSE 16:</b> a. The UST table (Table 3-7) has been modified to reflect the approved closure of these 9 tanks, in addition to the approval of closure of 32 additional tanks.</p> <p>b. Text on page 3-10 has been modified to read, "The Orange County Health Care Agency (OCHCA), Environmental Health Division regulates USTs in the County and is the lead agency for UST compliance for the Station. However, if a UST leaks and causes significant contamination, the RWQCB oversees cleanup and issues closure."</p>
<p><b>17. A general comment, I'd suggest the MCAS El Toro develop a timeline schedule for all UST closures/compliance for future versions of this document.</b></p>	<p><b>RESPONSE 17:</b> This comment will be considered for future BCPs.</p>
<p><b>18. Page 3-12, Section 3.2.1.2. Are any ASTs LOCs? If so it should be stated along with its status (i.e., NFA) here. If it still needs to be investigated/remediated it should be discussed here.</b></p>	<p><b>RESPONSE 18:</b> All ASTs are LOCs. Based on available information, no ASTs are currently being investigated.</p>

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DRAFT BRAC CLEANUP PLAN  
MCAS EL TORO, CALIFORNIA**

<p><b>Originator:</b> Larry Sievers Restoration Advisory Board Member Booz Allen &amp; Hamilton, San Bernardino, California</p> <p><b>To:</b> Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro, California</p> <p><b>Date:</b> 15 February, 1996</p>	<p style="text-align: right;"><b>CLEAN II Program</b> Contract No. N68-711-92-D-4670 CTO-0103/0062 File Code: 0222</p>
<p><b>19. Page 3-12, Section 3.2.1.3. Is the refueling system or components of the system a LOC? If so it should be discussed here. Are the pipelines considered part of UST system and therefore subject to closure as a UST component? Are fuel hydrant systems not regulated? Will the system be decommissioned and inserted prior to closure. These questions should be addressed in this section. Has the MCAS El Toro programmed money to complete the closure of the pipeline at some point after closure? The sooner after closure the better.</b></p>	<p><b>RESPONSE 19:</b> All information on USTs and associated components was obtained from the Engineering Department and the Environmental Office at the Station. As information on refueling systems and components and fuel hydrant systems becomes available and applicable, it will be included in future BCPs.</p> <p>As mentioned in the text, the fuel pipelines are not assets of MCAS El Toro. They will be addressed by the Defense Fuel Supply Center in the future.</p>
<p><b>20. Page 3-13, Section 3.2.2. Are any of the Haz Mat/Waste management areas designated as LOCs? If so they should be discussed along with their BCP Category status here.</b></p>	<p><b>RESPONSE 20:</b> All identified less-than-90-day accumulation areas are LOCs. Area type designations for less-than-90-day accumulation areas are not used to direct or focus cleanup, per se. Specific information on area types can be found in Table 3-9. The discussion of area types in section 3.4 includes accumulation areas.</p>
<p><b>21. Page 3-14, Section 3.2.2.3. Second paragraph, what about the accumulation areas not inspected? Is there a plan to inspect those?</b></p>	<p><b>RESPONSE 21:</b> The second paragraph indicates that majority of the sites were inspected as part of the draft final RFA. Any plans to inspect the remaining accumulation areas will appear in future BCPs and will be driven by potential risks that these areas may pose to human health or the environment and by available resources.</p>
<p><b>22. Page 3-15, Section 3.2.4.1. Are there any LOCs that are PCB transformer sites. If so they should be discussed along with their BCP category status here.</b></p>	<p><b>RESPONSE 22:</b> All identified PCB transformer sites are LOCs. Area type designations for PCB transformer sites are not used to direct or focus cleanup, per se. Specific information on area types can be found in Table 3-10. The discussion of area types in section 3.4 includes PCB transformer sites.</p>

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<p><b>23. Section 3.</b> It can be a little confusing for the reader because the BCP early on in the Executive Summary discusses LOCs, however the BCP does not consistently identify LOCs in Section 3 of the report. I'd suggest to follow through on the idea of LOCs that [sic] they be identified in Section 3. For example, the Exhibit ES-1 shows a distribution of LOCs. Lets look at PCB transformers, I note that there are 115 LOCs associated with them. In the PCB transformer section in Section 3, I see there is no elaboration on the LOC discussion. Ideally, I would like to see in the Section 3 PCB transformer section, the number of LOCs, and the number that are NFA and then a table would list the location and type of each. Then in Chapter 4 PCB section the plan to bring to resolution the remaining PCB LOCs with Category [sic] 5-7. This comment is global to the Section 3 subheadings.</p>	<p><b>RESPONSE 23:</b> Given the definition of LOCs, the BCP is clear and consistent in its use of the term.</p> <p>Each subsection in Chapter 3 discusses the status of each type of LOC, which includes, when applicable, no further action determinations. Also, nearly all types of LOCs have an inventory table associated with them which lists the location and other useful information about these LOCs.</p> <p>Chapter 4 discusses planned strategies for the environmental restoration of the various types of LOCs.</p>
<p><b>24. Page 3-19, Section 3.2.5.</b> Are any LOCs are associated with Asbestos?</p>	<p><b>RESPONSE 24:</b> There are no LOCs associated with asbestos.</p>
<p><b>25. Page 3-22, Section 3.2.7.</b> This section does provides a very good description of the status of SWMUs/AOCs associated with RCRA Facilities, starting on page 3-23. Do these SWMUs/AOCs directly correspond to LOCs? The approach here to describe the status of the facilities that are SWMU/AOC's [sic] is an example of how all LOCs should be tracked in Section 3.</p>	<p><b>RESPONSE 25:</b> SWMUs/AOCs correspond directly with LOCs by definition. The level of detail in this section is not practical or useful for many of the other types of LOCs such as USTs, OWSs and PCB transformers. Specific information on these LOCs is available in the respective inventory tables in Chapter 3.</p>
<p><b>26. Page 3-26, Section 3.2.9.</b> Just an observation, it does not look good when the status of 6 OWS [sic] is unknown. If someone wanted to be critical they would say "Why does no one know--can someone just drive out and check them out and report back a status." My suggestion is determine status or explain in detail why status is unknown, because it seems like a thing someone should know because by design OWS will concentrate contaminates [sic] and are known sources of contamination.</p>	<p><b>RESPONSE 26:</b> This comment makes a good point. However, due to resource constraints, time and effort are spent on those LOCs which potentially pose the greatest risk to human health and/or the environment. So even though checking the locations of OWSs for which the status is unknown may not take much effort or resources, this task may be considered a low priority.</p>

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<p>27. Page 3-28. Where in CCR Title 22 can we find the closure requirements for OWSs?</p>	<p><b>RESPONSE 27:</b> Due to the short time available to address comments, this specific information could not be incorporated into the final document. However, efforts to supply this information in future BCPs will be made.</p>
<p>28. Page 3-28, Section 3.2.10. Are any LOCs are associated with silver recovery units? If so they should be discussed along with their BCP Category status.</p>	<p><b>RESPONSE 28:</b> All identified silver recovery units are LOCs. Area type designations for silver recovery units are not used to direct or focus cleanup, per se. The discussion of area types in section 3.4 includes silver recovery units.</p>
<p>29. Page 3-30, Section 3.2.11. Discuss the circumstances that will require abatement in those housing units.</p> <p>Discuss [that] lead in soil associated with LBP is also a threat to human health. Given the above, has any soil sampling been completed or is any planned for the soil potentially affected by the lead based paint.</p>	<p><b>RESPONSE 29:</b> Circumstances that require abatement for lead based paint (LBP) are described on page 3-29.</p> <p>Information on lead in soil associated with LBP has been incorporated into the final document on page 3-30.</p>
<p>30. Page 3-43, Section 3.5.11. Identify the schedule for the start of the EIS and anticipated completion date.</p>	<p><b>RESPONSE 30:</b> This information is currently unavailable.</p>
<p>31. Table 3-1a. Identify this table the "LOC" Site Summary, it currently reads only Site Summary.</p> <p>If it were me, I would add the BCP category as a column and place the category [sic] 1-7 there. This would add value by allowing the reader to connect the LOC with a BCP category.</p>	<p><b>RESPONSE 31:</b> The current title is taken directly from the BCP guidance document (DoD 1993).</p> <p>This comment will be considered for future BCPs. Currently, the majority of LOCs have inventory tables associated with them which include area type designations.</p>
<p>32. Table 3-1b. If it were me, I would add the BCP category as a column and place the category [sic] 1-7 there. This would add value by allowing the reader to connect the Aerial Photograph Feature with a BCP category.</p>	<p><b>RESPONSE 32:</b> This comment will be considered for future BCPs. Section 3.4 (Environmental Condition of Property) states that the aerial photograph sites have been designated as area type 7.</p>
<p>33. Table 3-2. Should this table be Titled "<u>Points of Interest</u>" Location Summary? The current title Preliminary location summary seems awkward.</p>	<p><b>RESPONSE 33:</b> The current title is taken directly from the BCP guidance document (DoD 1993).</p>

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<p><b>34. Table 3.3. One could question the inclusion of soil gas surveys (an investigative technique) as an early action. Early Action to me is a removal or remedial action.</b></p>	<p><b>RESPONSE 34:</b> In previous drafts of the document, the BCT agreed to keep this information as it appears.</p>
<p><b>35. Table 3-7. A number of USTs which were pending regulatory approval in the March 94 BCP are still pending. This status should be updated. If regulatory approval has not been obtained, chances are the tank should be re-categorized to 7. If the MCAS El Toro still believes the UST site should be closed, the matter should be petitioned to the regulatory agency for concurrence.</b></p> <p>Just an observation, there are no BCP Category [sic] 1-4 sites that have had regulatory approval at MCAS El Toro. There are 58 sites on page 3-9 that are below LUFT levels are these the tanks which are currently Category [sic] 2,3,4, and 6, but marked with an asterisk? Also, page 3-9 states that 9 tank sites were closed but the table did not reflect which ones these are.</p> <p>The last column would more appropriately be titled "<u>BCP</u>" Area Type.</p> <p>Note, Section 4 should tell me what MCAS El Toro is going to do to bring the Category 5-7 UST sites down to a [sic] 2-4.</p>	<p><b>RESPONSE 35:</b> The explanation of the asterisks in the area type column has been clarified and changed. It now reads, "An asterisk (*) indicates that the <u>area type</u> [emphasis added] is pending BCT approval." These pending area type designations are for information purposes and are based on available information. The BCT will consider the validity these designations in the future.</p> <p>Based on the above clarification of "regulatory approval", this comment has been addressed.</p> <p>The 9 tank sites which have been closed (in addition to 32 others) have been identified in Table 3-7.</p> <p>In response to DTSC comments, the correct nomenclature for area types is Environmental Condition of Property (ECP) Categories or area types. The wording "ECP Area Types" appears in all applicable tables in the final document.</p> <p>Chapter 4 details the current strategy for the restoration of UST sites. Area type designations do not drive cleanup, so a discussion of how the Station will "bring the Category 5-7 UST sites down to [Categories] 2-4" is not appropriate. Other factors besides area type designation (i.e., risk to human health and the environment) determine restoration activities.</p>

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<p><b>36. Table 3-10. Just a question, can a PCB transformer be considered Category 1 (as it is on Table 3-10), or would the presence of PCB in a transformer be considered storage of a hazardous substance, because one could interpret an area that had a PCB transformer as a Category 2 which is defined as storage of a hazardous substance, but no known spills. The use of Category 1 should be discussed in Section 3.</b></p>	<p><b>RESPONSE 36:</b> The BCT agreed on area type designations for these PCB transformers in the final EBS (April 1995). No decision was made this year to change the area type designations in question. Further discussion on this issue may result in changing the area type designations for future BCPs. Since no decision was made, no discussion of the current area type designation appears in Chapter 3.</p>
<p><b>37. Table 3-8. Why are all ASTs Category 7? The Category 7 rationalization should be discussed in Section 3 including the reasoning for unknown categorization for a system located above ground that can be readily inspected to assess a Category.</b></p> <p><b>And Section 4 should tell me what MCAS El Toro is going to do to bring the Category down to a [sic] 2-4.</b></p>	<p><b>RESPONSE 37:</b> AST sites have been designated as area type 7 because the resources required to evaluate these locations are being utilized at sites where there is a higher perceived risk to human health and the environment. Because the tanks are aboveground, any releases are immediately noticeable and can be dealt with as needed.</p> <p>Area type designations do not drive cleanup, so a discussion of how the Station will “bring the Category down to [Categories] 2-4” is not appropriate. However, Chapter 4 does discuss strategies for restoration of ASTs at the Station.</p>
<p><b>38. Table 3-9. Not that I’m disagreeing, but I believe the categorization rationalization for OWS should be discussed in Section 3. And Section 4 should tell me what MCAS El Toro is going to do to bring the Category down to a [sic] 2-4.</b></p>	<p><b>RESPONSE 38:</b> Area type designations do not drive cleanup, so a discussion of how the Station will “bring the Category down to [Categories] 2-4” is not appropriate. However, Chapter 4 does discuss strategies for restoration of OWSs at the Station.</p>
<p><b>39. Page 4-5, Section 4.2.1. If 195 tanks are recommended for immediate closure, how come the UST table does not reflect 195 Category 2-4 USTs (note I did not count however there does not appear to be 195 USTs) asterisked for pending regulatory closure?</b></p>	<p><b>RESPONSE 39:</b> Recommendations for immediate closure are not based on area type designation. As information on these tanks becomes available, the area type designations will be revised accordingly.</p>

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<p><b>40.</b> Page 4-8, Section 4.2.1.2. This Section lacks a plan do [sic] re-categorize the AST from Category 7 to a Category [sic] 2-4. This section states that the use of ASTs will be assessed, however the AST table declares the environmental condition of these ASTs to be unknown. I suggest a simple visual site inspection and records search be performed for each AST and 5 or above, it must have a plan to eliminate the potential/contamination.</p>	<p><b>RESPONSE 40:</b> Please refer to RESPONSE 37.</p>
<p><b>41.</b> Section 4, General. Section 4 should discuss the strategy for lowering Category [sic] 5-7 LOCs, so they become Category [sic] 2-4. This is important because it will make re-use easier because property is: first, more desirable because it is free of negative environmental conditions and second, it will make more land transferable by deed instead of just transferable by lease. The government cannot transfer by deed contaminated property but can transfer by deed non-contaminated Category 2-4 property.</p>	<p><b>RESPONSE 41:</b> Area type designations do not drive restoration, per se. The focus of environmental restoration at El Toro is to expedite restoration, transfer, and disposal of property. Chapter 4 discusses the planned strategies to achieve restoration, transfer and disposal of property at the Station. As a clarification, land of area types 2-4 is not necessarily uncontaminated. Nonetheless, it is true that the land may be transferred by deed.</p>