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MCAS EL TORO
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TELEFAX TRANSMITTAL MEMORANDUM

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
**** OFFICE OF MILITARY FACILITIES ****

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SUBJECT: Comments on Draft Final Addendum to the REA

TO: Mr. Joseph Joyce - BRAC Environmental Coordinator

COMPANY NAME: MCAS El Toro

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MESSAGE /
COMMENTS:

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DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
245 West Broadway, Suite 425
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February 23, 1996

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:

COMMENTS ON DRAFT FINAL ADDENDUM TO THE RCRA FACILITY ASSESSMENT, MARINE CORPS AIR STATION (MCAS) EL TORO (VOLUME 6 OF THE FINAL RFA REPORT)

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated December 1995. A final RCRA Facility Assessment (RFA) report consisting of five volumes was issued in July 1993. DTSC provided comments that certain Solid Waste Management Units (SWMUs), Areas of Concern (AOCs) and Temporary Accumulation Areas (TAAs) would require additional evaluation to satisfy the DTSC conditional concurrence of the final RFA. The draft final Addendum to the RFA (Volume 6) represents the response to the DTSC Comments on the original RFA final report.

The enclosed comments are directed to the Marine Corps Air Station El Toro and their consultants. Overall, the report is well written. A few clarifications and modifications are needed as outlined in the general and specific comments below. Please incorporate the comments where appropriate. If you have any questions, please contact me at (310) 590-4891.

Sincerely,

A handwritten signature in black ink, appearing to read "Tayseer Mahmoud".

Tayseer Mahmoud
Remedial Project Manager
Base Closure Unit
Office of Military Facilities
Southern California Operations

Enclosure

cc: See next page.



Mr. Joseph Joyce
February 23, 1996
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cc: Ms. Bonnie Arthur
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DEPARTMENT OF TOXIC SUBSTANCES CONTROL

**Comments on
Draft Final Addendum To The RCRA Facility Assessment
(Volume 6 of the Final RFA Report)
for
Marine Corps Air Station-El Toro
Dated December 1995**

GENERAL COMMENTS

1. DTSC agrees with the recommendation that the following SWMUs require either additional investigation or remedial actions:

SWMU 7 - Transformer Storage Area

SWMU 46 - Vehicle Maintenance and Parking; DRMO Storage Yard

SWMU 88 - Drum Storage Area; Building 1601

SWMU 131 - Engine Test Cell; Building 447

SWMU 244 - PCB Spill Area; Building 244

DTSC is concerned about the recommendation to transfer the above SWMUs to the RAC for removal actions. The goal of conducting the RFA was to identify SWMUs, AOCs, and TAAs that have evidence of a release or suspected release of hazardous substances or petroleum products. If contamination is discovered as a result of a site investigation or limited sampling, that SWMU, AOC or TAA would be transferred into the basewide remedial activities being performed under the Base Realignment and Closure process. This report recommends that the above SWMUs will be remediated under a "RCRA stabilization initiative." Please be aware that conducting any type of RCRA remedial activities will result in DTSC oversight under RCRA Corrective Action. The next course of activity after the RFA in a RCRA Corrective Action is the preparation of a RCRA Facility Investigation (RFI), followed by a Corrective Measure Study (CMS). If the Department of Navy intend to continue with RCRA remedial activities, a RFI and CMS must be submitted for DTSC approval prior to any remedial activities.

2. **Cleanup Levels**

The remediation goals of the SWMUs should be consistent with the basewide remedial activities and the future reuse of the Station. The BRAC Cleanup Team should discuss the best method to incorporate the SWMUs into the basewide remediation strategy. The critical issue is the selection of a PCB action level. The industrial PRG, as being used for decisions regarding RAC cleanup appears overly conservative and is inconsistent with the PCB action level specified in the CLEAN II Draft Action Memo for Unit 2 Site 19 for MCAS El Toro. Within that document an action level of 5 mg/kg was selected for removal actions. If current and projected reuse scenarios are similar under both documents then action levels should be consistent, i.e., equivalent to the 5 mg/kg level.

Comments on MCAS El Toro Final RFA Addendum
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3. DTSC agrees with the recommendation that no further investigation of the following SWMUs are required at this time:

SWMU 9
SWMU 165
SWMU 171
SWMU 229
SWMU 260
SWMU 267

The SWMUs should be listed in the BRAC Cleanup Plan and a site inspection scheduled as the units are discontinued to verify that a release has not occurred after the issuance of this report.

4. DTSC cannot approve a no further investigation decision on SWMU 39 and SWMU 264 until the following information is provided:
- The borehole logs and soil sample analyses for SWMU 39 (See specific comment numbers 31 and 33 below).
 - A copy of the referenced document (Lee 1994) for SWMU 264 (See specific comment number 41 below).
5. DTSC agrees with the recommendation to remove the storage lockers from TAA 7.
6. DTSC agrees with the proposed actions for the Temporary Accumulation Areas listed in Table 1-2. The BRAC Cleanup Plan should include the proposed actions for each TAA.
7. There are several discrepancies between the borehole logs in Appendix B and the soil analytical data summary in Appendix D. The data summary table contains sample dates and sample depths that conflict with the borehole logs. Listed below are two examples:
- Borehole log for hole number 088H9 indicates that sample number 0650026 was collected at 0.7 - 1.2 feet below ground surface (bgs). The total depth of the hole is listed as 1.2 feet. The data summary table in Appendix D indicates that the "sample bottom depth" was 14 feet.
 - Borehole log for hole number 088H5 indicates a sample number 0650083 collected on June 12, 1995. The data summary table shows the analysis of a sample 088H5, Sample ID Number 0650175, collected on August 24, 1995.

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All the inconsistencies between the borhole logs and the data summary table need to be corrected or explained.

8. Include the CLEAN I analytical results on the figures along with the CLEAN II results for ease of comparison.
9. The term action level appears frequently and seems to be applied indiscriminately. Review the text, define the term and correct as necessary.

SPECIFIC COMMENTS

10. Page 1-1, First paragraph.

The RFA was performed at areas of concern at MCAS El Toro, not a particular site. The word site has an IRP connotation and should be used judiciously.

11. Page 1-1, First paragraph.

The first paragraph is missing a discussion of the CLEAN II work. As written it does not serve as an adequate introduction for this report and should probably be combined with Section 1.1.

12. Page 1-1, Section 1.1

Since PAHs are considered SVOCs, the text is redundant in the second paragraph, first sentence.

13. Page 1-1, Section 1.1, Second paragraph.

MCAS El Toro is an NPL site but it is not funded by the Superfund Program. All CERCLA restoration funds are obtained through the BRAC III accounts of the DoD.

14. Page 1-1, Section 1.1, Second paragraph.

The intent of the statement, "However, since MCAS El Toro is already a listed NPL site, it was inappropriate to fund additional assessment activities under CERCLA." is not clear. Please provide an explanation.

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15. Page 1-12, Figure 1-1 RFA Activities Decision Rules

The box that contains the text "MOVE TO THE RAC CONTRACTOR" should be replaced with wording similar to "Move to the BRAC Cleanup Process."

16. Page 1-13, Section 1.5 VARIANCES

Clarify the meaning of the expression "...sampling approach was compromised by one boring..." Does this mean that one boring was eliminated or does it mean that its statistically determined location was relocated?

17. Page 2-3, Section 2.1.3 Decontamination

In the last paragraph, second sentence, there is a typographical error in the spelling of United States Environmental Protection Agency. Also, "proscribe" is the opposite of the intent of the sentence.

18. Page 3-1, Section 3

Add a reference to the EPA QA/G-4 QAMS 1994 Final Guidance for the Data Quality Objectives Process.

19. Page 3-1, Section 3, Second paragraph.

Since this is an RFA, shouldn't the reference be to contaminant of potential concern, not contaminants of concern?

20. Page 3-1, Section 3, Third paragraph.

Add a reference to the 2nd Half 1995 USEPA Region IX Residential PRGs.

21. Page 3-1, Section 3, Third paragraph.

Replace the indirect reference to CLEAN I with the actual primary source document, i.e., the Final RFA Report issued by CLEAN I.

22. Page 3-1, Section 3, Third paragraph.

Maintain consistency with the final background levels which are being recalculated by the Marine Corps under CLEAN II.

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23. Page 3-2, The Table.

Identify the table with a table number and separate title.

24. Page 3-3, Section 3.1.1 DQOs For SWMU 7, First paragraph, last sentence.

Identify the group from which the off-site confirmation PCB samples were selected. That is, was it the total collected or a percentage of just the positive hits?

25. Page 3-3, Section 3.1.1 DQOs For SWMU 7, Second paragraph, last sentence.

What is the intent of "...samples could have been collected..."? Were the samples collected or not?

26. Page 3-3, Section 3.1.1 DQOs For SWMU 7, Third paragraph, last sentence.

The statement "...were to be performed..." is confusing. Were the analyses performed as indicated?

27. Page 3-3, Third paragraph and seventh paragraph.

In the 3rd paragraph, an "action level" for "petroleum contamination" of 1,000 mg/kg is defined. In the 7th paragraph, the text notes that "Diesel was detected below action levels (>15,000 microgram/kilogram)..." Also see page 3-6, "Diesel was detected above action levels (>100,000 microgram/kilogram)..." Furthermore, on page 3-11, Section 3.4.2, the text states that "Diesel/gasoline was detected below action limits in one sample (>15 mg/kg and <100 mg/kg)." Each of these statements is seemingly in conflict with each other.

What is the action level and what is the meaning of "...>15,000..."? Is the measured diesel greater than 15,000?

28. Page 3-4, Section 3.1.4 Recommendations

The recommendations in this report related to PCBs are not consistent with the Marine Corps current position on PCB action levels. The Draft Action Memo for Unit 2 Site 19 identified a level of 5 mg/kg.

29. Page 3-6, Section 3.2.1 DQOs For SWMU 9, First paragraph, third sentence.

In the first paragraph, third sentence, the referenced figure (Figure 3-2) should be revised to Figure 3-3.

30. Page 3-7, Section 3.2.2 Results, Second paragraph.

Confirm that thermal desorption for diesel is planned for MCAS El Toro. Recent discussions have indicated that the RAC will construct a landfarming biotreatment system at the Station.

31. Page 3-9, Section 3.3.1 DQOs For SWMU 39

Include a table which identifies the applicable action levels from the FSP. See also the second paragraph of Section 3.4.1.

DTSC's Comments on the final RFA Report dated January 24, 1994 (Appendix C) indicates that soil samples were collected from an angle boring. Were the soil samples collected for this report (borehole 039H3) above the location of the potential release of SVOCs and PCBs detected in auger boring 39A1? The report did not contain the borehole log for SWMU 39 and only the soil analysis for the sample collected at 8.5 feet. Please provide the borehole log and all soil sample analyses for SWMU 39.

32. Page 3-9, Section 3.3.2 Results, First paragraph, fourth sentence.

In the, the report should clarify the meaning of "applicable" PRGs.

33. Page 3-10, Figure 3-4 Sample Location and Results - SWMU 39

Below the table is an asterisk note that one result from off-site analyses reported total PAHs at 459 ppb. Please include the analysis of this sample in the data summary table in Appendix D. Also include the missing borehole log for SWMU 39 in Appendix B.

34. Page 3-12, Section 3.4.4 Recommendations

The first statement refers to action levels for diesel/gasoline as part of the final recommendation for a RCRA stabilization initiative; however, it is not clear what the action limits are.

35. Page 3-14, Section 3.5.2 Results, First paragraph.

In the first paragraph, the text states "Thirty-two samples were tested for PCBs using the immunoassay kit in the field..." In the second paragraph the text states that "PCBs were not detected by immunoassay in 44 of the samples..." There appears to be a discrepancy here.

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36. Page 3-14, Section 3.5.2 Results, Second paragraph.

The text identifies a PCB "...standard of 200 [microgram/kilogram] by immunoassay." The term "standard" apparently refers to the method detection limit of the immunoassay kits. Confirm and correct.

37. Page Section 3.5.2 Results, Fourth paragraph.

The maximum concentration reported in this document is 16 mg/kg not 14 mg/kg. Also see Section 3.5.4 the second sentence.

38. Page 3-15, Section 3.5.4 Recommendations

The recommendations in this report related to PCBs are not consistent with the Marine Corps current position on PCB action levels. The Draft Action Memo for Unit 2 Site 19 identified a level of 5 mg/kg.

Correct the text. The industrial PRG for PCBs is 340 microgram/kilogram not 330.

39. Page 3-23, Section 3.9.1 DQOs For SWMU 229, Second sentence.

The text references Figure 3-8, which is a figure of SWMU 171.

40. Page 3-25, Figure 3-9 Sample Locations and Results - SWMU 260

Below the table is an asterisk note that off-site confirmation was 130,000 mg/kg TPH - diesel. Shouldn't this be 130,000 µg/kg?

41. Page 3-26, Section 3.12.1 DQOs For SWMU 264, Fourth sentence.

In the fourth sentence, a reference is made to a document by Lee, 1994. Please include this document in the report.

42. Appendix D, Second paragraph, first sentence.

The descriptor SDG refers to "sample delivery group."

43. Appendix D, Second paragraph.

Replace the word proscribed with the correct term and identify which analyte exceeded its holding time and likewise confirm that it was a single analyte and not an entire sample which exceeded the holding time.