

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

CODE 13



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1996 FEB 21 PM 4:07

February 15, 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 BASE REALIGNMENT AND CLOSURE (BRAC) CLEANUP PLAN (BCP) FOR  
MARINE CORPS AIR STATION (MCAS) EL TORO**

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated January 16, 1996. This letter is to transmit the enclosed DTSC comments on the document.

If you have any questions, please contact me at (310) 590-4891.

Sincerely,

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

Enclosure

cc: Ms. Bonnie Arthur  
U. S. Environmental Protection Agency  
Region IX  
Hazardous Waste Management Division, H-9-2  
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Mr. Lawrence Vitale  
Remedial Project Manager  
California Regional Water Quality Control Board  
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Riverside, California 92501-3339



Mr. Joseph Joyce  
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cc: Mr. Vish Parpiani  
Environmental and Safety  
Marine Corps Air Station-El Toro  
P. O. Box 95001  
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Naval Facilities Engineering Command  
Southwest Division  
1220 Pacific Highway  
San Diego, California 92132-5181

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**  
**Comments on**

**Draft Base Realignment and Closure (BRAC) Cleanup Plan (BCP)**  
**for**  
**Marine Corps Air Station-EI Toro**  
**Dated January 16, 1996**

The list of comments below were prepared by Mr. Tayseer Mahmoud, Remedial Project Manager, and Mr. Ronald Okuda, Environment Assessment and Reuse Specialist from the Department of Toxic Substances Control. The comments are directed to the Department of Navy and their consultants. Overall, the cleanup plan is well written and thorough. A few clarifications and modifications are needed as outlined in the specific comments below. Please incorporate the comments where appropriate.

**SPECIFIC COMMENTS**

**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 1994.

**2. Chapter 1, Figure 1-2, Location of Past Hazardous Substance Activities**

Legend item number 6 should be listed as Explosive Ordnance Disposal.

**3. Chapter 2, Page 2-3, The paragraph beginning with "The final MCAS El Toro EBS report ...."**

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.

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.

**4. Chapter 2, Page 2-4, Section 2.2 Relationship to Environmental Programs**

We recommend the following changes to the first paragraph on this page: *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 120(h), as amended by CERFA in 1992. However transfers between federal agencies are exempt from covenants requiring environmental response action, CERCLA 120(h)(3)(B).*

**5. Chapter 3, Page 3-3, Second paragraph**

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:

*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:*

- *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).*
- *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).*
- *ECP Area Type 3 - Areas where storage, release, disposal, and/or migration of hazardous substances or petroleum products has occurred, but at concentrations that do not require a removal or remedial action.*
- *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 environment have been taken.*
- *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 under way, but all required remedial actions have not yet been taken.*
- *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.*
- *ECP Area Type 7 - Areas that are unevaluated or require additional evaluation.*

**INSTALLATION SUMMARY**

Operational Closure Date: 31-Jul-99 Location: Tustin, CA  
 Final Property Disposal Date: TBD Size: 1,383 acres

Total Property Available for Disposal:	1,383 acres	Environmentally Available for Transfer:	0 acres
Total Property Leased:	530 acres	Total Property Transferred:	0 acres
Property Leased to Other Federal:	58 acres	Property Transferred to Other Federal:	0 acres

**ENVIRONMENTAL SUMMARY**

BRAC Cleanup Team DoN BEC: Desire Chandler CAL-EPA, DTSC: Majed Ibrahim  
 US EPA Region IX: Dave Hodges  
Restoration Advisory Board Community Co-Chair: Joe V. Tucker Military Co-Chair: Desire Chandler  
 There are 28 members who meet on monthly basis.

Regulatory Program Not listed on National Priorities List (NPL). There is a Federal Facility Site Remediation Agreement (FFSRA) currently under negotiations.

Fast-Track Initiatives Major steps taken to expedite cleanup include: Initiated clean-up of former fuel farm area; Implemented a single phase Remedial Investigation at seven Installation Restoration Program (IRP) sites; Implemented a basewide groundwater Remedial Investigation; Used Expedited Site Characterization as developed by Argonne National Lab; mobilization of an on-site Thermal Desorption Unit; Identified early removal actions at 4 IRP sites and 27 Areas of Concern (AOCs).

Environmental Condition of Property Due to lack of definition of the groundwater conditions, IRP and AOC site characteristics, and the level of pesticides in the open areas currently cultivated, as of December 1994, the entire base property is classified as ECP Category 7. It is expected that the groundwater conditions will be better defined by late 1995 leading to a potential of identifying areas that may be eligible for transfer. (The chart below depicts two conditions: First, ECP conditions as anticipated without groundwater consideration and secondly, ECP conditions as anticipated with groundwater consideration to environmentally encumbered land area).

Environmental Baseline Survey Preliminary: 01-Dec-1993 Final: 01-Apr-1994

ECP Classification	1	2	3	4	5	6	7
Total Land Area (acres)	1,010	55	0	0	55	69	194
Environ. Encumbered Area (acres)	1,010	55	0	0			
Environmentally Available for Xfer	0	0	0	0			

**FINANCIAL SUMMARY**

As reported in FY96 President's Budget (\$000)

	FY94	FY95	FY96	FY97	FY98	FY99	Total
Cleanup Program	18,263	2,450	535	11,940	0	0	33,188
Compliance Program	15,237	722	7,402	5,290	0	0	28,651
Total	33,500	3,172	7,937	17,230	0	0	61,839

(Reflects FY94-99 funding profile. Additional requirements exist.)