

 12-6-94
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 MCAS EL TORO
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To: Mr. Joseph Joyce BRAC Environmental Coordinator MCAS El Toro
 Mr. Juan Jimenez Department of Toxic Substance Control
 Mr. John Broderick Santa Ana Regional Water Quality Control Board
 Mr. Bill Whittenburg RAB Community Co-Chair

Gentlemen,

I would like to thank you for the opportunity to read the BRAC Cleanup Plan for MCAS El Toro. The BCP was very complete and contained a level of detail that will make easier the eventual conversion of Air Station property to reusers. I have included my comments in hopes that they may make future editions of this document even more complete. Should you have any questions on my comments please do not hesitate to call, in fact I would appreciate any feed back on the usefulness of my comments. The comments range from editorial remarks to clarifications of policies and schedules.

1. Page 3 of 4 Table 1-2 1986-1991, KC-130 are tanker/transport aircraft not fighter/attack as written.
2. Page 3 Of 4 Table 1-2 1991 to Present, same comment as above.
3. Page 1-8 line 11, Text says Table 1-4 is Hazardous Waste Generating Activities table--but that titled table is Table 1-3.
4. Page 3-2 line 1, Is the Navy the "Lead Agency" or a party to the FFA, I think calling the Navy the lead agency is misleading. Generally, the FFA establishes a procedural framework and schedule for developing, implementing, and monitoring appropriate response actions in accordance with CERCLA. I think a better explanation of the FFA is in order to explain the roles and responsibilities of the parties to the FFA, again the reference to "lead agency" is most likely not appropriate- DOD agencies are the Lead Agency when a DOD installation is not under CERCLA.
5. Page 3-7 line 8, second bullet, Have these 11 USTs been closed out through OCHCA, if not when. "Clean" USTs sites are determined by the regulatory agency administering the states UST program, until regulatory acknowledgment of no contamination or no further action necessary--the status of the UST sites cannot be "clean" in a regulatory status, although the site may indeed be free contamination. Since the ultimate/mandatory goal is regulatory concurrence can these USTs be considered clean? Perhaps "clean awaiting regulatory acceptance".

6. Note on Section 3.2.1. It would be helpful if the BCP included a paragraph discussing how UST sites are closed by OCHCA, the process by which USTs are determined to no longer pose a threat to the environment or human health (clean).
7. Note on Section 3.2.1. AST and USTs on El Toro MCAS are subject to EPA regulations on Oil Pollution Prevention found in 40 CFR 112. 40 CFR 112 call for a site specific spill prevention contingency plan, does El Toro MCAS have such a plan-- it was not stated in the BCP.
8. Page 3-9 third paragraph, Does El Toro MCAS plan on complying with the Aboveground Petroleum Storage Act? If not perhaps the BCP should state so the reader will not be burden with asking the question--this also is the case with the non-compliance of USTs on Page 3-8 first paragraph
9. Page 3-13 line 13 The text states the PCB information needs to be verified-is this scheduled? when?
10. Page 3-17 line 1 When will the Pre-1980 ACM survey be conducted? Also, I suppose that post 1980 buildings are not being surveyed because it is likely they do not have asbestos due to manufacturing bans on ACM, however the bans were on manufacturing not installation, Therefore unless expressly forbidden by contract language ACM may have been used by contractors in post 1980 construction. Also, I have seen instances where post 1980 buildings have used equipment (i.e. boilers) from older facilities that do have ACM. It may be prudent, at a minimum, to inspect post 1980 buildings for possible ACM.
11. Page 3-16 line 5, Does the Navy have a formal policy for ACM at closing installations?, if so it should be summarized and/or appear in total in an appendix.
12. Page 3-18 line 2, Is the piping in Building 296 an AOC? Why or why not?
13. Page 3-18, Having not seen the RFA, who conducted the RFA? An RFA is undertaken by an authorized regulatory agency as part of the RCRA permitting process. This section does not discuss who conducted the RFA. Was the RFA conducted by a regulatory agency, or was this an RFA-like investigation conducted by the Navy? Perhaps this issue could be clarified in the text.
14. Page 3-19 line 9, I'm glad to see El Toro utilizing state programs for clean up where possible, avoiding the maze of CERCLA and still meeting requirements of the FFA.
15. Page 3-7 first bullet, Some USTs are in the IRP, but not all 24 mentioned as contaminated--what is the criteria for USTs to be placed into the CERCLA/IRP?
16. Page 3-9 Fuel Supply Pipelines, This section does not discuss how integrity testing of the fuel supply lines is accomplished. Other fueling systems I am familiar with use

annual pressure testing in combination with dedicated soil vapor probes or doubled walled pipes with leak sensors in the void space, are such systems in place? If not are there any known releases from this system? How is this system going to be closed out? To make this section complete I believe the above questions should be answered with emphasis on close out. The closeout of this system needs to be coordinated with the needs of the system by the Marine Corp, but also keep in mind that if the airfield is reused, close out of the system could affect aviation reuses by closing runways, taxiways and aircraft parking areas. Air Force closure bases have been asked to remove the liquid fuel distribution systems and to test for soil contamination, in some instances a RCRA closure. This is very intrusive and expensive effort— El Toro should ascertain the regulatory requirements for close out of this system as soon as possible in order to plan the logistics and program the funding necessary.

17. Page 3-23 line 13, Is it possible to provide the full cite to CCR 22 Division 4.5, because of the size of this section of regulations a precise citation allows the reader to access the regulations being raised without un-necessarily reading a large section of regulations. As a general practice throughout the document precise citations should be used in place of general, non-specific citations.

18. Page 3-24 lines 3,4, and 5, Again I find the reference to CCR Title 22 and CCR Title 23 too general, for example when UST are closed or taken out of service requirements imposed are Health and Safety Code section 25298; 23 CCR sections 2670-2672 as well as any local requirements. Refer to the local requirements/standards/guidelines, whatever the removal contractor will use when removing the tank.

19. Page 3-24, line 24, Provide citation for silver recovery closure in CCR Title 22, again this is vague and would it be helpful for the reader to know where to look for the closure requirement. It may even be better if the closure criteria could be discussed here.

20. Page 3-33, first bullet, This bullet states that UST removal sites that were found with analytical testing below detection limits can be Category 2, I do not believe this to be completely true—because UST closures must go through regulatory concurrence it is necessary to add that Category 2 UST removal sites are only Category 2 when they have received regulatory concurrence.

21. Page 3-35, line 7, third bullet, If ACM, LBP, PCB light ballasts are factors in Category 7, then when appropriate surveys/investigations programmed so the property can be cleared for transfer by deed. If this is sentence is saying until surveyed these factors are a Category 7 then perhaps I agree, however I am inclined to disagree. Categorization for , (based on my understanding of BRAC Air Force bases)——except for extreme circumstances, environmental factors such LBP, PCB, radon and ACM are disclosure and management issues not the type of environmental factor that would warrant holding up property transfers.

22. Table 3-1 It would be helpful if operational dates, contents and capacity of BASTS and USTs were in the table—this would allow the reader to determine the significance of the storage tank in terms of capacity, contents and age of the tank.

Table 3-1 Maybe because I did not read the entire document I may have missed something, but what is the significance of Site No. column? Would it not be easier to track items in this table by Building Number.

Table 3-1 Where a UST is present at a Building would it be correct to add a regulatory mechanism to the similar named column. Also, there some SWMU and AOC sites in the comments column but there is notation in the regulatory mechanism column, should there be?

Table 3-1 Given the number of columns and the amount of information being presented here, I think an introductory paragraph is in order to introduce the reader to the kinds of information and its importance.

Table 3-1 When will the following columns be filled in: Material Disposed of; date of operation; status; risk to human health and the environment?

23. Table 3-3 The table states that there have been no early actions however; Site 10 has had contaminated soil removed, Site 19 has had contaminated soil removed, also I thought a groundwater treatment plant was in place and I may be missing some soil removals—are these locations not considered "early action" if not then what are they considered.

24. Table 3-4 Who was the Draft UST Monitoring Plan submitted to?

Table 3-4 What is the status of the UST monitoring systems and permits?

Table 3-4 What are the "other related units" be investigated for asbestos (schools, childcare?)? What is the status of this survey and what is it's purpose?

25. Table 3-7 Again I contend that a UST should not be a Category 3 until closure is approved by the regulator. Also there is an asterisk by the Category at UST 13—I could not find the explanation for the asterisk.

Table 3-7 Starting of page 11 of 34, the integrity column states a frequency of yearly however the last test date is 1990—if testing is indeed yearly could more recent dates be shown? If not done yearly should the frequency column be changed to reflect the true situation.

Table 3-7 Because closure/removal/abandonment are very different in their meaning, may be we could place a "C" after the year to indicate closure etc.

Table 3-7 When will the survey for SB and S tanks take place? Also, it seems appropriate to call out these unlocated tanks in Section 3.2.1 as there are about 20 or so of them. This survey should be a priority because of the potential USTs have for environmental damage as well as their negative effect on potential reuse.

26. Table 3-8 15 ASTs seems low, given that air field support instruments, critical equipment, sewer and water pump stations are often supported by ASTs, i.e. Building 146 a stand by generator has no ASTs and a UST on site has been removed, where does it get fuel from? Also, I do not see any large jet fuel storage ASTs.

Table 3-8 If all ASTs are BCP area type 7, what kind of further investigations are proposed of to lower the category for transfer of property, and explain rationale for the 7 categorization.

27. Table 3-9 I understand the RCRA Part B facility has closed and under the permit I am sure a closure plan has been prepared and I would be surprised if the plan would call for a formal regulatory inspection of accumulation points—thus the accumulation points could not be anything but Category 7 until such an inspection is completed. Someone should confirm that such inspections are or are not necessary under the terms of the Part B permit. Other closure DOD facilities I am familiar with in a similar position were subject to such an inspection.

28. Table 3-10 To call this table "Hazardous Material Storage" is incorrect, they are actually by definition hazardous substances see 40 CFR 302

29. Table 3-13 I'd be interested in learning more information on Buildings 136 and 291 which are called Nuclear/Biological/Chemical storage. Perhaps an Ordnance section could be included in Section 3.2 and discuss issues like EOD, lead at firing ranges and the handling of "spacial" ordnance such as chemical.

Table 3-13 Are the Category 3 sites in this table backed up by analytical test data or other environmental evidence?

30. Section 4.1.5 If possible please list the ARARs in an appendix, or state where they can be found, I assume a conglomerated list has been created as called for under CERCLA.

31. Page 4-7, second bullet. It would be better to say USTs installed according to new tanks standards rather than just "double walled".

cc.

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Col E.J. Richie-Base Transition Coordinator Amy Schwartz-Bechtel

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December 14, 1994

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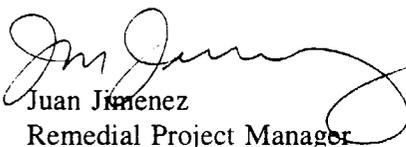
Dear Mr. Lee

PUBLIC COMMENTS ON BASE CLOSURE PLAN (BCP)

The Department of Toxic Substances Control (Department) has received the attached comments for the next BCP revisions. Please revise the BCP as appropriate.

If you have any questions, please feel free to call at (310) 590-4919.

Sincerely,


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