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Department of  
Toxic Substances  
Control

245 West Broadway,  
Suite 425  
Long Beach, CA  
90802-4444

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

November 27, 1996

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MCAS EL TORO  
SSIC # 5090.3



Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

**COMMENTS ON DRAFT BRAC CLEANUP PLAN, MARINE CORPS AIR STATION  
(MCAS) EL TORO**

Dear Mr. Joyce:

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated November 1996, prepared by Bechtel National, Inc. The report revises the March 1996 BRAC Cleanup Plan for MCAS El Toro.

This letter is to transmit the enclosed DTSC comments on the draft BCP and to Attachment A, questions prepared by Bechtel in a letter dated November 1, 1996 (Document Control Number CTO-0103/0103). A few clarifications and modifications are needed as outlined in the enclosed comments. Please incorporate the agreed upon comments, where appropriate. Thank you for your cooperation. If you have any questions, please call me at (310) 590-4891.

Sincerely,

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

Enclosure

cc: See Next Page



cc: Mr. Dimitri Hallerbach  
Bechtel National, Inc.  
401 West A Street, Suite 1000  
San Diego, California 92101-7905

Mr. Glen Kistner, SFD-8-2  
U. S. Environmental Protection Agency  
Region IX  
Federal Facilities Cleanup Office  
75 Hawthorne Street  
San Francisco, California 94105-3901

Mr. Lawrence Vitale  
Remedial Project Manager  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, California 92501-3339

Lt. Hope Katcharian  
Director, Environmental Engineering Division (1AU)  
Marine Corps Air Station-El Toro  
P. O. Box 95001  
Santa Ana, California 92709-5001

Mr. Andy Piszkin  
Remedial Project Manager  
Naval Facilities Engineering Command  
Southwest Division, Code 1831.AP  
1220 Pacific Highway  
San Diego, California 92132-5187

Mr. Bernie Lindsey  
Remedial Project Manager  
Naval Facilities Engineering Command  
Southwest Division, Code 1831.BL  
1220 Pacific Highway  
San Diego, California 92132-5187

Mr. Ronald Okuda  
Department of Toxic Substances Control  
245 West Broadway, Suite 350

*Mr. Joseph Joyce*  
*November 27, 1996*  
*Page 4*

bcc: Mr. Albert A. Arellano, Jr., P.E.  
Unit Chief  
Base Closure Unit  
Office of Military Facilities

Mr. Roy Yeaman  
State Project Team Leader  
Base Closure Unit  
Office of Military Facilities

Mr. Tayseer Mahmoud  
Project Manager  
Base Closure Unit  
Office of Military Facilities

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**  
**Comments on**  
**Draft BRAC Cleanup Plan**  
**Marine Corps Air Station El Toro**  
**Dated November 1996**

The list of comments below were prepared by Mr. Tayseer Mahmoud, Remedial Project Manager, and Mr. Ronald Okuda, Hazardous Substances Scientist from the Department of Toxic Substances Control. The comments are directed to MCAS El Toro and their consultants. A few clarifications and modifications are needed as outlined in the enclosed comments. Please incorporate the agreed upon comments, where appropriate, and send us a response to comments along with a revised document.

**SPECIFIC COMMENTS:**

**Executive Summary**

**1. First bullet item below STATUS OF DISPOSAL, REUSE, AND INTERIM LEASE PROCESS**

Please revise this item to "Community Reuse Plan by the MCAS El Toro Local Redevelopment Authority, and"

**2. Second bullet item from the bottom, Page ES-4**

The submittal dates for the Draft Final Phase II RI and Draft Final Phase II FS Reports for Site 24 are incorrect.

**3. Second bullet item, Page ES-5**

Please reference the document(s)/agreement(s) which demonstrate(s) that portions of Sites 15, 19 and 20 are no longer part of the IR program and have been withdrawn via the CERCLA petroleum exclusion. Also, send a copy of the document(s)/agreement(s) to DTSC for our administrative record.

**4. First complete paragraph, Page ES-9**

Please revise "Land Redevelopment Authority" to "Local Redevelopment Authority."

## **Chapter 1**

### **5. Third sentence of the fifth paragraph, Page 1-1**

I believe that this BCP when it is finalized, will be the March 1997 version.

### **6. Sixth paragraph, Page 1-1**

DTSC has not had the opportunity to review the 1996 version of the BCP Guidebook. Please distribute copies of the BCP Guidebook to the BCT members so that we can discuss any substantive changes.

### **7. Table 1-1, Current BCT/Project Team Members**

The Table needs to be updated because some of the members have changed.

## **Chapter 3**

### **8. The first item preceded by a dash, Page 3-2**

The documents related to OU-2A, Sites 24 and 25, have not been submitted for review. Please revise this section.

### **9. First item preceded by a dash, Page 3-7**

Please provide a copy of the agreement to withdraw the Sites 15 from the IR Program via the CERCLA Petroleum Exclusion.

### **10. Last sentence of the first full paragraph, Page 3-13**

The free product removal system is operational. The text states that “[T]he system is expected to be operational in early 1996 ....”

### **11. Section 3.2.7, RCRA Facilities (SWMUs), second paragraph, Page 3-24**

Please provide the status of the final Addendum to the RFA. The BCT should clarify whether the regulatory agencies approved the recommendations.

**12. Section 3.4, ENVIRONMENTAL CONDITION OF PROPERTY, Page 3-37**

The BCT has not received a copy of the revised BCP Guidebook, nor the August 1996 Addendum. The BCT members should be provided the opportunity to review any substantive changes in the BCP Guidebook and discuss whether the changes will impact earlier and current decisions regarding the environmental condition of property.

**13. Section 3.4, ENVIRONMENTAL CONDITION OF PROPERTY, Page 3-38**

The first paragraph list two acreage amounts.

**14. Sections 3.4.1 Area Type 1 and 3.4.2 Area Type 2, Page 3-39**

The revision of category types for Locations of Concerns to type 1 or 2 should be discussed with the BCT members after we have been given the opportunity to review the revised BCP Guidebook.

**15. Table 3-1a, Site Summary**

Please reference for each site the decision document/agreement that supports the No Further Action.

**16. Table 3-3, Early Action Status**

Please reference the agreement to withdraw the Site 15 (Unit 1), Site 19 (Units 1 and 4), and Site 20 (Units 2 and 3) from the IR Program via the CERCLA Petroleum Exclusion.

**17. Table 3-9, Less-Than-90-Day Accumulation Areas**

Table 3-9 has locations which indicate that ECP area types are pending BCT approval. When will the BCT discuss the proposed changes to the ECP Area Types?

**18. Table 3-13, Summary of SWMUs/AOCs**

When will the BCT discuss the proposed changes to the ECP Area Types?

**19. Figures 3-2b, 3-2c, 3-2d, and 3-2e**

It would assist the reader if the building numbers were indicated on a map of the base. Figures 3-2b through 3-2e does show the numbers to a majority of the building, but a significant amount of buildings are not listed or the numbers are illegible.

#### **Chapter 4**

**20. Section 4.1.3, Sequence of Operable Units, Page 4-4**

The second sentence of OU sequencing number 2 should be revised from “[The] draft Final Phase II RI and FS reports for OU-2A ....” to “[T]he draft Final Phase II RI and draft FS reports for OU-2A ....”

**21. Section 4.1.5, Remedy Selection Approach, last bullet item, Page 4-5**

Please be aware that the latest “Treatment Technologies Applications Matrix for Base Closure Activities, Revision 1, is dated November 1994.

#### **Chapter 6**

**22. Section 6.6 BASEWIDE REMEDIAL ACTION STRATEGY. fourth bullet item, Page 6-6**

Please revise this sentence from “.... to evaluate the withdrawal of OU-3 sites from the CERCLA process ....” to “.... to evaluate the withdrawal of some OU-3 sites from the CERCLA process ....”

**23. Section 6.7 INTERIM MONITORING OF GROUNDWATER AND STORMWATER, Page 6-8**

The first and second complete paragraphs. There appears to be a discrepancy in the number of water samples performed to date. Please verify whether there have been three groundwater and the storm water sampling rounds.

**24. Table 6-1, Future Land Use Risk Assessment for Development of Remedy Selections**

The draft Community Reuse Plan can be used to fill in the column on anticipated use.

**Response to specific questions posed in  
Attachment A prepared by Bechtel**

**Chapter 3**

- 1.b. & 10 Non-transformer PCB equipment do not have to be considered as LOCs as long as they are still in use. You would not have to put this information in Table 3-1a. However, please keep Table 3-11 in the BCP as this information will be necessary to disclose to the future property owner.
- 1.c. & 11.b. Buildings with asbestos would not necessarily be considered as LOCs since future use of the building will determine whether the asbestos will need to be abated. Therefore, I would recommend against including this information in Table 3-1a. Please keep Table 3-12 in the BCP as this information will be necessary to disclose to the future property owner.
- 1.d. & 13.a. The SWMUs/AOCs should be listed as LOCs in Table 3-1a if the BCT did not agree that no further action is required. One of the Tables should list these SWMUs/AOCs and provide information of the status (no further action/further action) and the decision document that supports the action. Regardless, the locations of the SWMUs/AOCs (even NFA sites) should be shown on the BCP figures.
- 1.e. & 7.b. The active < 90-day accumulation areas should be included in Table 3-1a and all the accumulations areas should be shown in one of the figures. The active < 90-day accumulation areas could be considered LOCs because they need to be re-inspected and possibly decontaminated before they are discontinued.
- 2.a. I believe that the contractors reviewed and conducted a site visit of some of the > 100 features/anomalies and were able to exclude a number of them. This may be the reason for the remaining 53 features/anomalies. The BCT should determine whether a visual site inspection report exists to document removal of the features/anomalies from the BCT and the reason for the removal should be documented in Table 3-1b. This will prevent any uncertainties in the future on whether the BCT approved the removal of the aerial feature/anomalies. All features/anomalies should be included in Table 3-1b