



BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

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

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TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 57CS1.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA 92132-5187

DATE: September 23, 1997
CTO #: 0135
LOCATION: MCAS El Toro

FROM: Dante J. Tedaldi, Ph.D., P.E., Project Manager

DESCRIPTION: Response to Comments on Draft Interim ROD, Operable Unit 2A, Site 24 Vadose Zone and Associated Responsiveness Summary (Various Dates)

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CLEAN II Program
Bechtel Job No. 22214
Contract No. N68711-92-D-4670
File Code: 0222
IN REPLY REFERENCE: CTO-0135/0091

September 23, 1997

Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 57CS1.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA 92132-5187

Attention: G. Steinway, Code 56MC.GS

Subject: Response to Agency Comments on Draft Interim Record of Decision, Operable
Unit 2A - Site 24 Vadose Zone

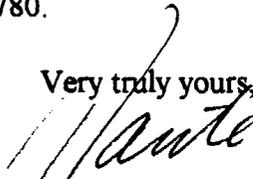
Dear Mr. Selby:

It is our pleasure to submit this Response to Agency Comments on the Draft Interim Record of Decision (ROD), Operable Unit 2A - Site 24 Vadose Zone, for the Marine Corps Air Station (MCAS) El Toro, California, prepared under Contract Task Order (CTO) 0135 and Contract No. N68711-92-D-4670. This document is submitted in accordance with the Federal Facilities Agreement and the associated schedule for that agreement.

We gratefully acknowledge the high level of cooperation and team work demonstrated by personnel from MCAS El Toro, Southwest Division, the United States Environmental Protection Agency, California Department of Toxic Substances Control, and Regional Water Quality Control Board - Santa Ana Region which has facilitated the timely submittal of this document.

We have submitted the appropriate number of copies of this report to individuals listed on the attached transmittal. We appreciate the opportunity to be of service to you on this project. If you have any questions or would like further information, please contact Jane Wilzbach at (619) 687-8861, or myself at (619) 687-8780.

Very truly yours,



Dante J. Tedaldi, Ph.D., P.E.
Project Manager

DJT/sp

Enclosure: Response to Agency Comments on Draft Interim Record of Decision, Operable
Unit 2A - Site 24 Vadose Zone



Bechtel National, Inc. Systems Engineers-Constructors

**RESPONSE TO COMMENTS
DRAFT INTERIM RECORD OF DECISION,
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE,
MCAS EL TORO, CALIFORNIA**

<p>Originator: Tayseer Mahmoud, Remedial Project Manager DTSC</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: July 23, 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>COMMENTS</u></p> <p>1. Declaration, Description of Remedy, page 2: Add the following bullet from the text in Section 10.1:</p> <p style="padding-left: 40px;">“The vadose zone will be resampled at the conclusion of groundwater remediation. If the soils are found contaminated above the threshold limits, additional vadose zone remediation will be necessary.”</p>	<p><u>RESPONSE TO COMMENTS</u></p> <p>RESPONSE 1: A bullet has been added as requested. The text of the bullet was clarified from the suggested wording to be consistent with language in other portions of the ROD and DTSC Comment 7 (see below) and reads as follows: “the vadose zone will be resampled at the conclusion of groundwater remediation. If the average soil gas concentrations are found to be above the threshold limits, additional vadose zone remediation may be necessary.”</p>
<p>2. Declaration, Statutory Determination, page 3: Please change the signature block for Department of Toxic Substances Control to read as follows:</p> <p style="padding-left: 40px;">Mr. John E. Scandura, Chief Southern California Operations Office of Military Facilities Department of Toxic Substances Control</p>	<p>RESPONSE 2: Mr. Scandura has been added as signatory to the ROD.</p>
<p>3. Section 7.2, Alternative 2 - Soil Vapor Extraction, page 7-2: Please revise the second paragraph from the bottom of page 7-2 that mentions deed restrictions. The suggested text deletions are crossed out text and additions are underlined.</p> <p style="padding-left: 40px;">Institutional controls, including deed restrictions and access restrictions, are not required <u>at this time</u> to protect human health because surface and near-surface soils have low levels of VOC contamination and present a very low incremental risk to human health. <u>Also, the remediation of the contaminated soil may be completed prior to property transfer. However, if the SVE system is still operating at the time of deed transfer, deed restrictions will be used to protect the SVE wells and equipment during remediation and provide access to operate the system. Land use restrictions will also be used to ensure that future development is protective of human</u></p>	<p>RESPONSE 3: The paragraph has been revised to indicate that the transfer of the property will be in accordance with 120(h)(3) of CERCLA.</p>

**RESPONSE TO COMMENTS
DRAFT INTERIM RECORD OF DECISION,
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE,
MCAS EL TORO, CALIFORNIA**

<p>Originator: Tayseer Mahmoud, Remedial Project Manager DTSC</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: July 23, 1997</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>health and does not interfere with the effectiveness of the remedy. These restrictions are not anticipated to will not be required once remediation is complete.</u></p>	
<p>4. <u>Section 2.2.1, Description of the Soil Vapor Extraction System:</u> Provide a statement that additional SVE wells may be added at the design stage to target the different areas of contamination shown on Figures 7-2 through 7-4.</p>	<p>RESPONSE 4: This statement has been added.</p>
<p>5. <u>Section 2.2.4, Monitoring:</u> Add a new paragraph concerning vadose zone sampling at the conclusion of groundwater remediation (see Section 10.1).</p>	<p>RESPONSE 5: This paragraph has been added.</p>
<p>6. <u>Section 3, Highlight of Community Participation:</u> See attached Memorandum date July 21, 1997 from Ms. Marsha Mingay, our Public Participation Specialist.</p>	<p>RESPONSE 6: Ms. Mingay's comments have been incorporated.</p>
<p>7. <u>Section 10.1, Protection of Human Health and the Environment, Page 10-1:</u> The last sentence of this section implies that additional vadose zone remediation may be required in the future. The ROD should clearly disclose that there is the potential for additional remediation in the future which may impact reuse of the property. For example, the future land owner may have to accommodate SVE equipment and allow for access to operate and monitor the system.</p>	<p>RESPONSE 7: Page 2 of the Declaration has been revised to clarify that there is a potential for future vadose zone remediation.</p>
<p>8. <u>Section 10.2, Compliance with ARARs, Table 10-3:</u> Add Transportable Treatment Unit 22 CCR 67450 ARARs and the following Generator requirements:</p> <ul style="list-style-type: none"> - Manifesting 66262.20 - Packaging 66262.30 - Labeling 66262.31 - Marking 66262.32 	<p>RESPONSE 8: Generator requirements, including packaging, labeling, marking, placarding, and accumulation time, have been added as applicable requirements for Site 24. The Navy will fully comply with all manifesting requirements for hazardous wastes generated as a result of this remedial action. However, since manifesting is not an on-site activity, it is not an ARAR for Site 24. Record Keeping, Biennial Report, and Certification Requirements for Generators are non-substantive requirements and therefore not ARARs for this remedial action.</p>

**RESPONSE TO COMMENTS
DRAFT INTERIM RECORD OF DECISION,
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE,
MCAS EL TORO, CALIFORNIA**

Originator: Tayseer Mahmoud, Remedial Project Manager DTSC	CLEAN II Program Contract No. N68-711-92-D-4670
To: Joseph Joyce BRAC Environmental Coordinator	CTO-0135 File Code: 0222
Date: July 23, 1997	
<ul style="list-style-type: none">- Placarding 66262.33- Accumulation Time 66262.34- Record Keeping 66262.40- Biennial Report 66262.41- Certification Requirement for Generators 66262.45	

**RESPONSE TO COMMENTS
DRAFT INTERIM RECORD OF DECISION,
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE
MCAS EL TORO, CALIFORNIA**

<p>Originator: Glenn R. Kistner, Remedial Project Manager U.S. EPA</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: July 24, 1997</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>COMMENTS</u></p>	<p><u>RESPONSE TO COMMENTS</u></p>
<p>1. <u>Pg. 1, Declaration</u> - Description of Remedy: References to Site 25 should be deleted since the focus of the ROD is Site 24.</p>	<p>RESPONSE 1: The references to Site 25 have been deleted.</p>
<p>2. The signature page of the Declaration should be revised to remove EPA's Regional Administrator and insert Daniel D. Opalski, Chief, Federal Facilities Cleanup Branch as the signatory for EPA.</p>	<p>RESPONSE 2: Mr. Opalski has been added as signatory to the ROD and EPA's Regional Administrator has been removed.</p>
<p>3. <u>Pg. 5-2:</u> Second to the last paragraph makes a statement that TCE usage ended in approximately 1975; p. 5-9, second paragraph is a little less definitive. It states "assumed end of TCE usage." Please modify the language to be more consistent.</p>	<p>RESPONSE 3: The text on page 5-2 has been revised to state: "The trend of increasing soil gas concentrations with depth suggests a depleting source at the surface that is consistent with the <i>assumed</i> end of TCE usage in approximately 1975." Since the use of TCE at MCAS El Toro is not documented, it is not possible to state when the usage ended.</p>
<p>4. <u>Pg. 5-5:</u> Table 5-1 includes vehicle wash racks as potential surface sources of VOC contamination while table 5-3 lists vehicle wash racks as subsurface sources.</p>	<p>RESPONSE 4: The vehicle wash racks are considered potential subsurface sources because of the sumps and drains associated with the wash racks. Tables 5-2 and 5-3 have been revised to place the wash racks in the correct category.</p>
<p>5. <u>Pg. 5-20:</u> The last sentence in the first paragraph states that exposure to contamination in soils could occur through ingestion, inhalation or dermal contact, yet the first sentence of the second paragraph on pg. 9-1 states that soil contamination is too deep to present a direct risk to human health and the environment. These statements appear to be a contradiction and should be resolved.</p>	<p>RESPONSE 5: The risk assessment was performed for shallow soils (up to 10 feet below ground surface). For these soils, exposure to contaminants could occur through ingestion, inhalation, or dermal contact. However, the results of the risk assessment showed that the contaminants in this soil interval do not represent an unacceptable risk to human health. The second paragraph on page 9-1 has been rewritten to clarify that shallow soils at Site 24 do not represent an unacceptable risk and that remediation of deeper subsurface soil will eliminate the threat of future contamination of groundwater above the MCLs.</p>
<p>6. <u>Pg. 6-1:</u> The last sentence in the first paragraph states that no</p>	<p>RESPONSE 6: According to the Work Plan for Site 24, there are no special</p>

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OPERABLE UNIT 2A, SITE 24 VADOSE ZONE
MCAS EL TORO, CALIFORNIA**

<p>Originator: Glenn R. Kistner, Remedial Project Manager U.S. EPA</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: July 24, 1997</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p>ecological risk assessment was performed because it does not provide a suitable habitat for any endangered species. Page 10-4 in Table 10-2 (Location Specific ARARs) lists the CA Endangered Species Act because of the American Peregrine Falcon. This is another apparent contradiction that needs resolving.</p>	<p>status species present at Site 24. Therefore the CA Endangered Species Act is not an ARAR for this site. Table 10-2 has been revised accordingly.</p>
<p>7. Pg. 6-6: The third full paragraph discusses the risks for adults and children. Why is the risk from exposure to COPCs in ground and soil to children living in the homes less than the risk for adult occupants?</p>	<p>RESPONSE 7: The risk is less for children than adults because the exposure duration is assumed to be less. Children living in homes at the site are assumed to be exposed to chemicals present in the soils for only 6 years. Adults living in homes at the site are assumed to be exposed for 30 years, 6 years as a child and 24 years as an adult.</p>
<p>8. Pg. 6-10: The last sentence states that actual or threatened release from this site may present an imminent and substantial endangerment to public health. This statement seems to be over-broad since the risk from the site being addressed in this ROD is really only the risk from continuing contamination of the groundwater. I would suggest eliminating this language altogether.</p>	<p>RESPONSE 8: This sentence has been deleted.</p>
<p>9. Pg. 7-16, Periodic Reviews: Please reference the Table 4 Soil Gas Concentration Threshold Results in the text.</p>	<p>RESPONSE 9: A reference to the soil gas concentration results has been added to the text.</p>
<p>10. Pgs. 10-2 through 10-6: The ARARs tables should indicate whether a requirement is applicable or relevant and appropriate. The same holds true for the ARARs narrative discussion.</p>	<p>RESPONSE 10: A column has been added to the ARARs tables to clarify whether a requirement is applicable or relevant and appropriate. The ARARs narrative discussion has also been revised as suggested.</p>
<p>11. Page 10-2: The second row refers to Vadose zone protection standards. Isn't it more for protection of groundwater rather than Vadose zone?</p>	<p>RESPONSE 11: It is the Navy's position that the substantive provisions of Title 22 CCR Section 66264.94(a)(1), (a)(3), (c), (d), and (e) constitute "relevant and appropriate" ARARs for both soil and groundwater. The heading on Table 10-1 has been revised accordingly.</p>

**RESPONSE TO COMMENTS
DRAFT INTERIM RECORD OF DECISION,
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE
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<p>Originator: Glenn R. Kistner, Remedial Project Manager U.S. EPA</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: July 24, 1997</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p>12. <u>Pg. 10-10:</u> Before the Action-specific ARARs, there should be the CA Endangered Species Act which is in Table 10-2.</p>	<p>RESPONSE 12: Please see the response to Comment 6. The CA Endangered Species Act has been deleted from Table 10-2.</p>
<p>13. <u>P. 10-11:</u> Another reason why the public notification requirements are not ARARs is because these are not environmental standards or standards of control.</p>	<p>RESPONSE 13: A sentence has been added to the end of the first paragraph on page 10-11 to note that public notification requirements are not ARARs because they are not environmental standards or standards of control.</p>
<p>14. <u>P. 10-11:</u> Since El Toro does not own any permitted unit within 100 meters of the proposed SVE location, Rule 1401 is not applicable. This section may want to make it clear that this requirement is not applicable but that El Toro thinks it is relevant and appropriate and will therefore comply with the requirement.</p>	<p>RESPONSE 14: The reference to "other permitted sources within 100 meters owned or operated by the applicant" refers to the requirement in Rule 1401 for applicants to evaluate cumulative impacts of emissions. Applicability of this requirement, however, is not based solely on the presence or lack of other permitted sources at the site.</p>

**RESPONSE TO COMMENTS
DRAFT INTERIM RECORD OF DECISION (ROD),
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE
MCAS EL TORO, CALIFORNIA**

<p>Originator: Lawrence Vitale CRWQCB</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: August 8, 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>COMMENTS</u></p> <p>1. The ARARs discussion in Section 10.2.1.1 identifies Title 22 CCR Section 66264.94 as an ARAR for the vadose zone remediation. Section 66264.94 requires cleanup of the soil to background or to the extent technically and economically feasible and the cleanup must at least achieve the MCL in the groundwater (or other more stringent water quality objective in the Basin Plan). The discussion of the vadose zone cleanup in ROD section 7.2, however, does not appear to implement Section 66264.94. The ROD states that “threshold concentrations” are used as remedial action objectives for the vadose zone, and lists several criteria used to evaluate the threshold concentrations. One criteria is that a 40 foot mixing zone would be used. It is not clear how that criteria is used, but use of a mixing zone is not consistent with State Water Resource Control Board orders. The State and the Department of the Navy and the Air Force engaged in a dispute concerning the issue of determining shutoff criteria for vadose zone cleanups. To comply with Section 66294.94, it was the State’s position that the SVE cleanup must be operated to the extent technically and economically feasible and must at least be operated until the residual VOCs do not result in groundwater exceeding the cleanup levels specified in the ROD. The State did not agree with the use of a mixing zone to determine whether VOCs in the vadose zone would no longer impact groundwater above the cleanup level of the groundwater. However, in order to settle the dispute, the State agreed to allow use of the mixing zone in the model as one criteria to be considered, but other criteria must also be analyzed to assess the VOCs in the soil. This ROD should be changed to state that the vadose zone will be remediated to the extent technically and economically feasible and the SVE system will be operated until the residual VOCs do not result in migration to groundwater above the cleanup levels of the groundwater. In addition, the ROD must</p>	<p><u>RESPONSE TO COMMENTS</u></p> <p>RESPONSE 1: The DON disagrees with the RWQCB on this issue and considers the use of the 40 foot mixing zone appropriate for establishing soil gas threshold values for the Site 24 vadose zone.</p> <p>The DON, U.S. EPA, and RWQCB have discussed this issue and have agreed that the RWQCB can accept the Site 24 Interim ROD with the addition of the following language:</p> <p style="padding-left: 40px;">“The Regional Water Quality Control Board does not agree that the method and criteria used for determining “threshold concentrations” for shutoff of the SVE system complies with State Water Resources Control Board Resolution No. 92-49 or with Title 23, California Code of Regulations, Section 2550.4 or Title 22, California Code of Regulations, Section 66264.94. It is the Board’s position that the use of a 40-foot mixing zone and a point of compliance in the ground water and other assumptions used in setting “threshold concentrations” will not necessarily result in cleanup of the vadose zone to the extent technically and economically achievable and at least to a level that assures that contaminants will not discharge into ground water at levels greater than the aquifer cleanup levels for the underlying ground water. However, the Marine Corps has agreed to reevaluate the shutoff criteria in the final ROD for Site 24. Therefore, the Regional Water Quality Control Board will not dispute this Interim ROD.”</p> <p>The statement will be placed at the end of Section 10.2.1.1.</p> <p>In addition, the last sentence under the heading “State of California’s Position Regarding SWRCB Resolution Nos. 68-16 and 92-49” will be modified to read: “However, the State does not intend to dispute the ROD. See below.”</p>

**RESPONSE TO COMMENTS
DRAFT INTERIM RECORD OF DECISION (ROD),
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE
MCAS EL TORO, CALIFORNIA**

<p>Originator: Lawrence Vitale CRWQCB</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: August 8, 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p>require that the State will have an opportunity to review and approve the shutoff of the SVE system.</p>	<p>In addition, the DON will delete the third sentence of the second paragraph in Section 10.2.1.1 under the heading "Relationship between groundwater and Vadose Zone" and will delete the point of compliance reference in Figure 5-1.</p>
<p>2. As signatories to the Federal Facilities Agreement, please include our executive officers signature for ROD approval;</p> <p>Mr. Gerard J. Thibeault Executive Officer Santa Ana Regional Water Quality Control Board</p>	<p>RESPONSE 2: Mr. Thibeault has been added as a signatory to the ROD.</p>

**RESPONSE TO COMMENTS
PUBLIC PARTICIPATION COMMENTS ON SECTION 3,
DRAFT INTERIM RECORD OF DECISION,
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE
MCAS EL TORO, CALIFORNIA**

<p>Originator: Marsha Mingay, Public Participation Specialist DTSC</p> <p>To: Tayseer Mahmoud, Remedial Project Manager DTSC</p> <p>Date: July 21, 1997</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>COMMENTS</u></p> <p>1. First paragraph: To clarify and reduce wording, rewrite the first paragraph to read,</p> <p>“There are a total of 24 sites that are being investigated at MCAS El Toro. A Community Relations Plan was developed to document concerns identified during community interviews and provide a detailed description of the community relations activities planned in response to information received from the community. The initial plan was prepared in 1991, and revised in 1993 and 1996. The revisions incorporated the most recent assessment of community issues, concerns, and information needs related to the ongoing environmental investigation and cleanup program at MCAS El Toro.”</p> <p>The above wording eliminates duplicative wording which described why there have been revisions to the CRP.</p>	<p><u>RESPONSE TO COMMENTS</u></p> <p>RESPONSE 1: The paragraph has been rewritten as requested.</p>
<p>2. Second paragraph, second sentence:</p> <p>a) substitute the word “performing” with “conducting”,</p> <p>b) add “presentations to local groups”, and</p> <p>c) rewrite to form a complete sentence.</p>	<p>RESPONSE 2: The sentence has been rewritten as requested.</p>
<p>3. Section 3.1, third sentence: Add “and regulatory” immediately after, “Marine Corps/Navy.”</p>	<p>RESPONSE 3: The sentence has been revised as suggested.</p>
<p>4. Section 3.2, first sentence: Substitute the word “assure” with “ensure”.</p>	<p>RESPONSE 4: The sentence has been revised as suggested.</p>
<p>5. Section 3.2, second sentence: To complete the list of categories who received fact sheets, rewrite to read, “...to city, state and federal officials, agencies, local groups and individuals...”</p>	<p>RESPONSE 5: The sentence has been revised as suggested.</p>

**RESPONSE TO COMMENTS
PUBLIC PARTICIPATION COMMENTS ON SECTION 3,
DRAFT INTERIM RECORD OF DECISION,
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE
MCAS EL TORO, CALIFORNIA**

<p>Originator: Marsha Mingay, Public Participation Specialist DTSC</p> <p>To: Tayseer Mahmoud, Remedial Project Manager DTSC</p> <p>Date: July 21, 1997</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p>6. Section 3.2, fourth sentence: To include a very important component of fact sheets, please rewrite to read, "... process, and ways that the public can participate in the investigation and clean up of MCAS El Toro."</p>	<p>RESPONSE 6: The sentence has been revised as suggested.</p>
<p>7. Section 3.2, last sentence: To complete the list of recipients, reword to read, "... 1,800 households, businesses, public officials and agencies ..."</p>	<p>RESPONSE 7: The sentence has been revised as suggested.</p>
<p>8. Section 3.3, first paragraph:</p> <ul style="list-style-type: none"> a) capitalize "proposed plan" in the first sentence, b) the name of newspapers should be underlined (see first and second paragraphs), and c) if press releases were used, these should also be mentioned. d) The four sentences explaining the locations of records is very convoluted. Please simplify information. 	<p>RESPONSE 8:</p> <ul style="list-style-type: none"> a) "Proposed Plan" has been capitalized. b) Newspaper names have been underlined. c) Media alerts were used to notify reporters that the public was invited to to the public meetings and to encourage the reporters to attend and publicize the events. Media personnel were also included on the mailing list for the Proposed Plan for Site 24. d) The sentences explaining the locations of the administrative records have been simplified.
<p>9. Section 3.3, second paragraph:</p> <ul style="list-style-type: none"> a) add "Proposed Plan" to the list of vehicles used to announce the meeting (see second sentence), and b) to be more precise, rewrite the third sentence to read, "... regulatory agencies answered questions about ... consideration and recorded verbal and written comments." c) Since the NCP is a regulation, it must be followed whenever applicable. Correct the second to the last sentence by deleting "to the extent practicable." d) To clarify the last sentence, add the words "information contained 	<p>RESPONSE 9: The paragraph has been revised as suggested.</p>

**RESPONSE TO COMMENTS
PUBLIC PARTICIPATION COMMENTS ON SECTION 3,
DRAFT INTERIM RECORD OF DECISION,
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE
MCAS EL TORO, CALIFORNIA**

<p>Originator: Marsha Mingay, Public Participation Specialist DTSC</p> <p>To: Tayseer Mahmoud, Remedial Project Manager DTSC</p> <p>Date: July 21, 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p>within” immediately after “... is based.”</p>	
<p>10. <u>Table 3-1</u>: The fact sheet numbering contained within the table is incorrect as the November 1991 and December 1992 fact sheets were not numbered. To correct and clarify the information, please insert dashes versus a number for these two fact sheets. Fact Sheet number one, was issued in December 1993.</p>	<p>RESPONSE 10: Table 3-1 has been revised as suggested.</p>

RESPONSE TO COMMENTS
RESPONSIVENESS SUMMARY ASSOCIATED WITH DRAFT INTERIM RECORD OF DECISION
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE
MCAS EL TORO, CALIFORNIA

<p>Originator: Tayseer Mahmoud, Remedial Project Manager DTSC</p> <p>To: Andy Piszkin SWDIV</p> <p>Date: August 7, 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>COMMENTS</u></p> <p>1. <u>Response 1f:</u> Please add the following sentence to the end of the second paragraph:</p> <p style="padding-left: 40px;">“Additional vadose zone remediation may be required in the future at the conclusion of groundwater remediation if soils are found contaminated above threshold limits.”</p>	<p><u>RESPONSE TO COMMENTS</u></p> <p>RESPONSE 1: The following sentence has been added to the end of the second paragraph: “The vadose zone will be resampled at the conclusion of groundwater remediation. If the average soil gas concentrations are found to be above the threshold limits, additional vadose zone remediation may be necessary.” The wording has been clarified from that suggested to be consistent with language used in the ROD and with DTSC Comment No. 7 on the Site 24 ROD (included with this transmittal).</p>

RESPONSE TO COMMENTS
RESPONSIVENESS SUMMARY ASSOCIATED WITH DRAFT INTERIM RECORD OF DECISION,
OPERABLE UNIT 2A, SITE 24 VADOSE ZONE
MCAS EL TORO, CALIFORNIA

<p>Originator: Jennifer Rich DTSC</p> <p>To: Tayseer Mahmoud, Remedial Project Manager DTSC</p> <p>Date: August 8, 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>COMMENTS</u></p> <p><u>Acronyms/Abbreviations, Page 27:</u> All of the following acronyms/abbreviations should be spelled out the first time they are used in the document:</p> <p>MCAS - page 1 DON, FFA, CERCLA - page 2 TCE - page 5 NCP, CFR - page 6 U.S. EPA, ROD - page 8 RAB - page 9 Cal-EPA - page 11 ARARs, RWQCB, OU - page 17</p>	<p><u>RESPONSE TO COMMENTS</u></p> <p>RESPONSE: The abbreviations have been spelled out as requested.</p>
<p>All of the following acronyms/abbreviations, which are used throughout the document, should be added to the list on page 27:</p> <p>ARARs - see page 17 Cal-EPA - see page 11 CFR - see page 6 CLEAN - see page 18 DCA - see page 18 FFA - see page 2 MCL - see page 11 mL - see page 18 VOA - see page 18</p> <p>Also, please change "EPA" to "U.S. EPA".</p>	<p>RESPONSE: The acronyms/ abbreviations have been added to the list on page 27.</p>
<p><u>Page 1, Response to Comment 1a:</u> Please add a sentence to the end of the paragraph explaining that the documents are available for review and give the location.</p>	<p>RESPONSE: The name, address, and telephone number of the information repository have been added to this paragraph.</p>

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<p>Page 3, Response to Comment 1e: Please change this response to read, "The Site 24 investigation was directed at VOCs. However, other Installation Restoration Program (IRP) sites were developed within the boundary of Site 24 to address non-VOC contaminants. Non-VOC contaminants at Site 24 were evaluated as part of the investigation of IRP Sites 7, 8, 9, 10, 11, and 22. The investigation findings for these sites will be summarized in separate Proposed Plans. The Proposed Plan for Sites 9, 10, and 22 was distributed in June 1997. The Proposed Plan for Sites 7, 8, and 11 is expected to be distributed in 1999. None of the contaminants identified to date at these sites would affect the proposed SVE system. Besides the IRP Sites, the use and eventual closure of facilities supporting the operation of MCAS El Toro will be evaluated for non-VOC contaminants that may have an impact to surrounding soils within the boundary of Site 24. All these locations of potential environmental concern are summarized in the Base Realignment and Closure (BRAC) Cleanup Plan (BCP)." Also, explain that the BCP is available for review and give the location.</p>	<p>RESPONSE: The response has been changed as requested.</p>
<p>Page 3, Response to Comment 1f: In the second paragraph, "DON" doesn't need to be spelled out. It was first used on page 2, where it should be spelled out.</p>	<p>RESPONSE: This paragraph has been modified as noted.</p>
<p>Page 5, Response to Comment 3b: Please respond to the part of the comment regarding "monitoring".</p>	<p>RESPONSE: The response to Comment 3b has been revised to discuss monitoring and to more clearly define how rebound will be addressed during remediation.</p>
<p>Page 6, Response to Comment 3e: In the first paragraph, please provide some discussion about the RAB's opposition to this type of public meeting and why, despite this opposition, the Navy went forward with the public meeting format they did. Also, please clarify who the "public recorder" is. In the first bullet item, if the notice also announced the availability of the supporting documents, please state in the response.</p>	<p>RESPONSE: The proposed meeting format was generally acceptable to the RAB when it was first proposed. Opposition to the meeting format was most strongly expressed after the meeting. However, most of the RAB members who expressed discontent with the format did not attend the meeting. Subsequent to the public meeting for Site 24, a public meeting has also been held for the No Action sites. RAB members attending the second meeting</p>

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<p>In the third bullet item, there is no need to spell out "BRAC" based on my previous comment (see Page 3, Response 1e above).</p> <p>Please change the sixth bullet item to read, "A transcript of the public meeting was prepared and made available at the (please fill in the blank) for public review."</p>	<p>have generally recanted their opposition to this type of format.</p> <p>Additionally, the Navy felt that the purpose of the public meeting was to educate the portion of the public who did not have the time to attend the RAB meetings or become involved in the remediation process through RAB membership. The ultimate decision about how best to educate the public was made by the Navy.</p> <p>The nature and responsibility of the public recorder have been clarified as requested.</p> <p>The Proposed Plan and public notice both announced the availability of the information repository.</p> <p>The definition (spelling out) of BRAC has been removed from the third bullet item.</p> <p>The sixth bullet was revised to state that a transcript of the public meeting was prepared and made available at the administrative record file at MCAS El Toro.</p>
<p>Page 9, Response to Comment 4e: It might be helpful to mention that Department of Defense (DoD) and Navy RAB guidance calls for RAB meeting minutes to be in summary form.</p>	<p>RESPONSE: The response has revised to refer to EPA and DoD guidelines on RAB meeting minutes.</p>
<p>Page 12, Response to Comment 8: In the fourth sentence, please change "question" to "comment". Also, for comparison to MCAS El Toro's air flow and VOC concentrations listed in sentence six, please indicate what "relatively high VOC concentrations and low air flow" measurements might be.</p>	<p>RESPONSE: "Question" has been changed to "comment" as requested. Relatively high VOC concentrations and low air flow measurements were defined as VOC concentrations on the order of 10,000 µg/L and air flow of approximately 500 cubic feet per minute or less.</p>
<p>Page 15, Response to Comment 9a: In the second sentence, please change "prepared for and appeared" to "placed".</p>	<p>RESPONSE: "Prepared for and appeared" has been changed to "placed." The third sentence has been revised as requested.</p>

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<p>Please change the third sentence to read, "The public meeting was also announced in the Proposed Plan, which was sent to newspaper, television, and radio news organizations as well as to approximately 1,800 households, public officials and agencies, and businesses in the vicinity of MCAS El Toro." Also, if the ad which was placed in the papers was a display ad rather than a legal ad (which is much smaller) then I might be helpful to mention that in the response.</p>	<p>Display size ads are used by the Navy to publicize the public meetings at MCAS El Toro.</p>
<p>Page 16, Response to Comment 10: Please change the response to read, "Please see the response to Comment 1e."</p>	<p>RESPONSE: The response has been rewritten as requested.</p>
<p>Page 16, Response to Comment 11: There is no need to spell out "TCE" because it was previously used on page 5 where it should be spelled out.</p>	<p>RESPONSE: The response has been revised as noted.</p>
<p>Page 17, Response to Comment 11: Please add a sentence to the end of the first paragraph explaining that the documents are available for review and give the location.</p> <p>In the third paragraph, please respond to the second part of question B1 regarding validation.</p>	<p>RESPONSE: A sentence was added to the end of the first paragraph explaining that the documents are available for review at the Administrative Record File at MCAS El Toro.</p>
<p>Page 18, Response to Comment 11: In the first sentence, "RI" and "Marine Corps Air Station" don't need to be spelled out because they were previously used on page 1.</p> <p>In the fourth sentence of the second paragraph, "ug/L" doesn't need to be spelled out because it was previously used on page 5.</p> <p>In the last sentence of the second paragraph, "B51366020" is used, but in two other places (page 18, paragraph 2 and page 19, paragraph 1), "B5136020" is used. Please make the appropriate corrections.</p>	<p>RESPONSE: Corrections have been made as requested. The correct vial lot number is B5136020. The lot number has been corrected where appropriate.</p>
<p>Page 19, Response to Comment 11, B1: Please change the last sentence to read, "The document was made available for public review at the Information Repository."</p>	<p>RESPONSE: The sentence has been changed as requested.</p> <p>The Proposed Plan for Site 24 was not in place at the time of the March 26,</p>

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<p>Please explain in the response, why the RAB was not informed at the March 26, 1997 meeting that the proposed plan was in place and the comment period was to commence.</p>	<p>1997 meeting. However, the meeting minutes for the March 26, 1997 RAB meeting discuss the upcoming Proposed Plan, the public review and comment period, and the public meeting for Site 24. The meeting minutes state that the public review and comment period will run from April 30 through May 30 and that a public meeting is scheduled for May 15, 1997. These events took place as planned and one of the main subjects of the next RAB meeting (held on May 28, 1997) was the May 15, 1997 public meeting.</p>
<p>Page 21, Response to Comment 11 In the first sentence of the paragraph, please insert "PCE" prior to "cleanup".</p>	<p>RESPONSE: "PCE" has been inserted prior to "cleanup".</p>
<p>Page 21, Response to Comment 11: In the first sentence of the paragraph, please insert "PCE" prior to "cleanup".</p>	<p>RESPONSE: The sentence has been revised as requested.</p>
<p>Page 25, Comment 18: In the second paragraph, there should be a space between "accepted" and "manner".</p>	<p>RESPONSE: The space has been added.</p>
<p><u>SUMMARY OF RESPONSES TO BCT MEMBER</u> Acronyms/Abbreviations, Page 9 All of the following acronyms/abbreviations should be spelled out the first time they are used in the document: BCT, U.S. EPA, CERCLA - page 1 CLEAN - page 2 TCE - page 3 TCA, DCE - page 4</p>	<p>RESPONSE: The acronyms/abbreviations have been spelled out as requested.</p>
<p>All of the following acronyms/abbreviations, which are used throughout the document, should be added to the list on page 9: CERCLA - see page 1 DCE - see page 4 Also, please delete "EPA" because "U.S. EPA" is already included in the list.</p>	<p>RESPONSE: The acronyms/abbreviations have been added to the list on Page 9.</p>

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<p>Page 2, Response to Comment 1b: In the first paragraph "B51366020" is used, but in the third paragraph "B5136020" is used. Please make the appropriate correction.</p>	<p>RESPONSE: The correct vial lot number is B5136020. The first paragraph has been corrected accordingly.</p>