



Cal/EPA

February 25, 1998

Pete Wilson  
Governor

Department of  
Toxic Substances  
Control

Peter M. Rooney  
Secretary for  
Environmental  
Protection

245 West Broadway,  
Suite 350  
Long Beach, CA  
562-4444

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:

**DRAFT FINAL PROPOSED PLAN FOR LANDFILL SITES AT MARINE  
CORPS AIR STATION (MCAS) EL TORO**

The Department of Toxic Substances Control (DTSC) has reviewed the draft final Proposed Plan (PP) for the landfill sites at MCAS El Toro. DTSC remains concerned that the proposed remedy (native soil caps) may not be compatible with the draft Reuse Plan for future land use as proposed by the Local Redevelopment Authority (LRA) for landfill sites 3 and 5, which may restrict future uses of the sites. DTSC's position is based on information contained in the Marine's Feasibility Study (FS) submittal which specifically indicated that the native soil cap is not compatible with an irrigated golf course (pages 5-10 and 5-11 of the draft final FS); however, the Reuse Plan proposes that Site 5 will be part of a golf course.

In accordance with the NCP Section 300.430(e)9(iii)(H) and OSWER Directive 9335.3-02 Chapter 3, Section 3.2.4, DTSC requests that the following statement be inserted in the PP under the State/support agency acceptance criterion in the Evaluation of Alternatives section:

*"DTSC remains concerned that the Marine's proposed remedy (native soil caps) may not be compatible with the draft Reuse Plan for future land use as proposed by the Local Redevelopment Authority (LRA) for landfill sites 3 and 5. Hence, it may restrict future uses of the sites. DTSC believes that other remedies may be more compatible with the future land use. For example, Alternative 4D, synthetic flexible membrane liner (FML), appears to be more appropriate for a future recreational use scenario, such as the golf course at Site 5. Alternatives 5B or 6B, asphalt caps, would have a better likelihood of supporting a future light industrial/commercial reuse at Site 3."*

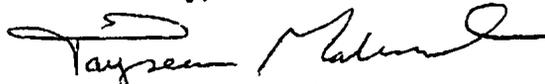
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We would like to point out that this letter also reflects the position of the California Integrated Waste Management Board (CIWMB), which shares DTSC's concerns regarding the proposed remedy and questions its compatibility with future land use. Please note that comments from the CIWMB and DTSC in our letter dated November 17, 1997 on the draft PP reflect our recommendations for evaluating other alternative remedies for Sites 3 and 5 that would support the Reuse Plan. Also, the California Regional Water Quality Control Board has advised us verbally in a recent meeting that they did not take into consideration the post-closure uses when they recommended native soil caps for the landfills.

We note for the record that the Marines did not accept DTSC's recommendations for selection of other remedies that may be more compatible with the future land use, and that the Marines would not grant a request from DTSC for a 60-day extension to resolve reuse issues with the LRA, despite the fact that the United States Environmental Protection Agency's support of the extension request in our telephone conference of February 23, 1998. DTSC had hoped to achieve consensus among local, state, and federal agencies in selection of the proposed remedy before making the PP available to the public.

For additional comments on the PP, please see the enclosed comments from our Public Participation Specialist, Ms. Marsha Mingay. If you have any questions, please call me at (562) 590-4891.

Sincerely,



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

Enclosure

cc: Mr. Glenn R. Kistner  
Remedial Project Manager  
U. S. Environmental Protection Agency  
Region IX  
Superfund Division (SFD-8-2)  
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cc: Mr. Lawrence Vitale  
Remedial Project Manager  
California Regional Water Quality Control Board  
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Mr. Peter Janicki  
California Integrated Waste Management Board  
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Mr. Steven Sharp  
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Ms. Candace Haggard  
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MCAS El Toro Local Redevelopment Authority  
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Mr. Tim Latas  
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Mr. Gregory F. Hurley  
Restoration Advisory Board Co-chair  
8001 Irvine Center Drive, Suite 900  
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cc: Mr. Andy Piszkin  
Remedial Project Manager  
Naval Facilities Engineering Command  
Southwest Division, Code 1831.AP  
1220 Pacific Highway  
San Diego, California 92132-5187

**MEMORANDUM**

Pete Wilson  
Governor

Peter M. Rooney  
Secretary for  
Environmental  
Protection

**TO:** Mr. Tayseer Mahmoud  
Remedial Project Manager

**FROM:** Ms. Marsha Mingay *MM*  
Public Participation Specialist

**DATE:** February 11, 1998

**SUBJECT:** COMMENTS ON THE DRAFT FINAL PROPOSED PLAN FOR  
LANDFILL SITES 2, 17, 3 AND 5, MCAS EL TORO

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Thank you for the opportunity to review the above referenced final draft document. The military's Response to Comments addressed the majority of my earlier comments. However, please review the following comments for possible incorporation into the final Proposed Plan. Of the comments listed, the issue associated to ecological wording is considered a major concern. Pending resolution of these comments, Public Participation finds that the Proposed Plan meets our requirements.

**Ecological (page 5):**

In reference to my earlier comments (dated November 23, 1997) regarding ecological impacts (see MCAS El Toro's Response to Comments number 25 and 26) the Proposed Plan does not state how Alternative 3 reduces the elevated risk to ecological receptors. According to the Proposed Plan there is an elevated risk to ecological receptors, such as the California gnatcatcher. Please include language in the Proposed Plan that states how Alternative 3 will reduce this current risk level.

**Risk Assessment (page 5):**

It is suggested that the technical information presented on page 5 be further clarified. Specific suggestions include:

**Article: Estimating Human Health and Ecological Risks**

1. Reword the last sentence in the first paragraph to read, "... provide an extra margin of safety to protect ...".
2. In the fourth paragraph it is unlikely that the general public member will understand the purpose of the target management cancer ranges (i.e., "... and excess upper bound lifetime cancer risk to an individual of between  $10^{-4}$  ... and  $10^{-6}$ "). It is suggested that additional information be presented which informs the reader how this range is used.

Associated to the fourth paragraph mentioned above, the paragraph addressing



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risk assessment results for soil could be simplified for easier understanding. The following alternative wording is suggested, "The chance of a child contracting cancer from exposure to soils while playing at Sites 2 and 17 and for an industrial worker at Site 3 is (state the number). This is considered acceptable by U.S. EPA guidelines. Noncancer risks from exposure to soils are also at acceptable levels by the U.S. EPA."

**Alternative 3 - Preferred Alternative - Single Layer Soil Cap (page 7)**

The text does not include any discussion regarding the suitability of Alternative 3 for Site 5 and how the preferred alternative is compatible with the proposed reuse as a golf course.

**Alternative 4 - Single-Barrier Cap (page 8)**

The text does not include any discussion regarding the suitability of Alternative 4 for Sites 3 and 5 and how this alternative is compatible with the proposed reuses of the sites.

**Conceptual Design maps (page 12)**

Please show area to be consolidated for Sites 17 and 3, in a similar manner and format as used for Site 2 (i.e., through cross-hatch, labeling and text).

**Administrative Record (page 13):**

According to the National Contingency Plan (section 300.810), the administrative record should include decision documentation leading to the proposed plan. Although the Proposed Plan (see page 13) does not specifically mention historical comments submitted to the lead agency concerning the remedial investigation/feasibility study phases, it is anticipated that these documents (comment letters from the Restoration Advisory Board members, agency representatives, etc.) would also be included in the Administrative Record for these landfills.

**Applicable or Relevant and Appropriate Requirements for Proposed Closure of MCAS El Toro Landfills (page 14)**

To make all bullets consistent, change the wording in the last bullet under the subheading, "... DTSC", to read, "design, construction, operation and maintenance to prevent washout due to a 100-year flood".