

**RESPONSE TO COMMENTS
DRAFT FINAL PROPOSED PLAN FOR CLEANUP
AT THREE SHALLOW SOIL SITES
OPERABLE UNIT 3, SITES 8, 11, AND 12
MCAS EL TORO, CALIFORNIA**

<p>Originator: Marsha Mingay, Public Participation Specialist DTSC</p> <p>To: Tayseer Mahmoud, RPM DTSC</p> <p>Date: February 18, 1999</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0155 File Code: 02221</p>
<p><u>GENERAL COMMENTS</u></p> <p>I. <u>Changes to the May 1998 Proposed Plan for Closure of Inactive Landfills</u></p> <p>As stated in my September 17, 1998 memorandum, the regulations require the lead agency to circulate for public comment any changes to the proposed plan that the public could not “reasonably anticipate”. It is my belief that using nonhazardous contaminated soil as a cap foundation layer for Sites 2 and 17 could not be reasonably anticipated. Therefore, the public must be notified of this change and provided with an opportunity to comment on the proposed plan.</p> <p>Also stated in the September 17, 1998 correspondence was the suggestion to include this information in the Proposed Plan for Cleanup at Three Shallow Soil Sites. Since this document does not contain a discussion of the changes, it is unclear if the military is planning to circulate a separate document addressing the changes or if this information was inadvertently omitted from the draft final Proposed Plan.</p> <p>Due to the importance of this issue, please request that the military inform DTSC in writing of their intent to satisfy the regulation and the means in which they will fulfill their legal obligations (i.e., will this draft final Proposed Plan be expanded to include a discussion of the changes to Landfill cap or will they issue a separate document for public review and comment). Please note that the discussion should contain sufficient information to educate the public so that they are able to make comments about the proposed changes to the preferred alternative for landfills 2 and 17. (I’ve attached a copy of my September 17, 1998 memorandum which states what should be included in this discussion; specifically Section I and Section II,</p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p> <p>RESPONSE I: We believe that this issue will best be resolved as part of an on-going dialog under the remediation of OU-2B, Sites 2 and 17.</p> <p>This Proposed Plan for Sites 8, 11 and 12 adequately and appropriately addresses the alternatives and the preferred remedy for Sites 8, 11 and 12.</p>

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<p style="text-align: center;">Comment 1).</p>	
<p><u>SPECIFIC COMMENTS</u></p>	<p><u>RESPONSES TO SPECIFIC COMMENTS</u></p>
<p>II. <u>Specific Comments on Draft Final, February 1999, Proposed Plan for Three Shallow Soil Sites (Sites 8, 11 and 12)</u></p> <p>1. Page 1, first column, second paragraph, third sentence — To clarify that this information is not only for the public’s review, but also open for comment, add “... are available for public review <u>and comment at the ...”</u></p>	<p>RESPONSE 1: The phrase was incorporated into the document.</p>
<p>2. Page 1, second column, third paragraph — To educate and further clarify the information, change the existing sentence to read, “Investigation results indicate all contaminated soil is not hazardous <u>to human health and the environment.</u>” (In my September 17, 1998 comments, I stated, “To educate the public, please explain how contaminated soil can be nonhazardous”).</p>	<p>RESPONSE 2: The phrase “. . . to human health and the environment.” was incorporated into the document.</p> <p>The paragraph was updated to clarify how contaminated soil can be non-hazardous. However, an in-depth explanation of contaminated, hazardous and non-hazardous would likely be too cumbersome for this document. We plan to address the topic of contaminated vs. hazardous soil as an agenda item at the 3/31 RAB meeting. We will also be prepared to address any questions at the subsequent public meeting for this Proposed Plan.</p>
<p>3. Page 2, first column, last paragraph — The paragraph includes reference to above ground treatment tanks without an introduction. Please introduce this equipment by explaining how it is related to the sludge drying beds (see my former comment Section III, comment 5).</p>	<p>RESPONSE 3: The sentence that discussed the above ground tanks is not necessary and was deleted.</p> <p>For the portion of the comment in parenthesis, see Response to Comments, dated February 19, 1999, on the Draft Proposed Plan, Response III, No. 5.</p>
<p>4. Page 2, second column, second to the last paragraph — The following sentence has been added to the document, “PCB analysis also includes pesticides.” This sentence does not logically connect with the information within this paragraph. Please correct.</p>	<p>RESPONSE 4: The sentence is not applicable to the paragraph and was deleted.</p>
<p>5. Page 3, map — Please include a legend which explains the meaning for the different shading and speckled areas.</p>	<p>RESPONSE 5. The diagram on Page 3 is merely for site location purposes. The legend for the more detailed site diagrams found on Pages 8 and 9 has been improved to better delineate Unit boundaries and will make it easier for</p>

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	<p>the reader to differentiate areas recommended for remedial action vs. areas recommended for no further action.</p>
<p>6. Page 3, second column, italic wording — See comment number 1.</p>	<p>RESPONSE 6: Incorporated into the document.</p>
<p>7. Page 4, second column, Risk Assessment Results, Site 12 — Metals were also found at site 12 but are not included in the list. Have they been omitted because they do not pose a human health risk? If yes, then the statement is correct. However, if the answer is no, please research and correct the information.</p>	<p>RESPONSE 7: Yes, the statement is correct. Metals are not a risk driver at Site 12 (the same is true at Sites 8 and 11).</p>
<p>8. Page 5, Site 8 — The table states, “Arsenic and manganese occur naturally in native soil on and off MCAS El Toro property.” Please include in this document a statement which educates the reader on the importance of this fact.</p>	<p>RESPONSE 8: This information is documented on page 2, right column, last paragraph and on page 9 in the Definitions of Chemical and Technical Terms.</p>
<p>9. Page 5, site 8 — It is not clear why the risk numbers have been combined for units 2 and 3 when the other units have their own risk numbers. It is suggested that a footnote be added to explain this to the public.</p>	<p>RESPONSE 9: Risk numbers have been combined for Units 2 and 3 because Unit 3 is physically located within Unit 2. Similarly, because Unit 4 is located within Unit 1, the risk numbers for these units have also been combined.</p>
<p>10. Page 5, Site 11 — Risk Management Considerations only address PCBs when page 3 mentions that pesticides are also present at these sites. Please include information which addresses risk management consideration in terms of the pesticides found at Site 11.</p>	<p>RESPONSE 10: On page 4 in the document under “Risk Assessment Results” the text for Sites 8, 11, and 12 states that PCBs are a contributor to human health risk, only. Pesticides are not a human health risk. (Only constituents that are a human health risk are discussed in the Risk Management Considerations).</p>
<p>11. Page 5, Site 12, Unit 1 — Please provide a clearer explanation as to why PAHs are being remediated at Site 8, Unit 3 and not at Site 12, Unit 1.</p>	<p>RESPONSE 11: PAHs are not recommended for remediation at Site 8 Unit 3. If the comment refers to Site 8 Unit 5 – the cancer risk at Site 8 Unit 5 is greater than the cancer risk at Site 12 Unit 1. The relatively high non-cancer risk number for Site 12 Unit 1 is explained in Footnote “b” of the table.</p>
<p>12. Page 7, first column, first partial paragraph — As stated in my September 17, 1998 memorandum (see Section III, Comment 14), the reference to day care center is misleading and limiting. Please either explain why this narrow focus is being used, or change the</p>	<p>RESPONSE 12: The reference to day care centers was removed from the text. The suggested substitute sentence reads as follows: “The covenant would limit use at the site to industrial activities that are protective of the cap and also</p>

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<p>wording. The following substitute sentence is suggested, "The covenant would limit use to industrial activities which are protective of the cap and would allow continued maintenance and inspection."</p>	<p>allow Marine Corps and regulatory agency access to the site to maintain or inspect the cap."</p>
<p>13. Page 7, first column, first full paragraph - The statement that the area would be backfilled if necessary conflicts with the information on page 1. The statement on page 1 clearly indicates that the area will be backfilled. Please research and correct.</p>	<p>RESPONSE 13: The wording "if necessary" was deleted from the Alternative 3 description on page 7, to assure consistency with Page 1.</p>
<p>14. Page 7, first column, second and third paragraphs — These paragraph state that certain actions will be taken if necessary. Please include information which allows the reader to understand what needs to occur in order for these actions to be implemented (i.e., installation of a drainage system and the seeding and fertilization of backfilled soil at site 12).</p>	<p>RESPONSE 14. The "if necessary" terminology was removed from these sentences. The installation of a drainage system and seeding backfilled soil are components of the Alternative 3 remedy for site restoration.</p>
<p>15. Page 7, first column, last paragraph — The paragraph states, "recycle all the contaminated soil excavated from these sites that is not hazardous". Please also state what will be done if hazardous soil is found.</p>	<p>RESPONSE 15: Additional text (two new sentences) was added to the Revised Draft Final Proposed Plan to inform readers what would be done if hazardous soil were identified. These two new sentences read, "Based on remedial investigation results, hazardous levels of contaminants are not expected to be present. However, if hazardous wastes are identified during excavation they would be disposed off-Station at a state-permitted hazardous waste disposal facility."</p>
<p>16. Page 7, second column, first partial paragraph — The following sentence needs to be supported with facts. How was this assertion formulated? The recycling of soil will "not change the risks at the landfill sites". (See my September 17, 1998 comment: Section III, Comment 18).</p>	<p>RESPONSE 16: The sentence in question ending with "would not change the risks at the landfill sites" has been deleted from the document. The sentence now reads, "This procedure would reduce the long-term risks to human health and the environment at Sites 8, 11, and 12. No exposure pathway to the recycled soil by people or animals would exist after the landfill is capped." The issue of landfill caps, exposure pathways and risk will addressed during the Remedial Design phase of the remediation of Landfills 2 and 17.</p>
<p>17. Page 7, second column, first partial paragraph — The following</p>	<p>RESPONSE 17: Page 7 is referring to exposure pathways after the landfill is</p>

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<p>sentence conflicts with the information on page 11. Please correct as appropriate. Page 7, "No exposure pathway to people created during this activity." Page 11, "Excavation may expose workers to contaminants."</p>	<p>capped. The information on Page 11 refers to the excavation of the soil from Sites 8, 11, and 12 and transporting the soil to the landfills.</p>
<p>18. Page 7, second column, first partial paragraph — Please also substantiate the claim, "... it is highly unlikely animals ... would burrow down four feet deep through the cap to the foundation layer material."</p>	<p>RESPONSE 18: The entire sentence in question was removed from the document. The issue of integrity of landfill caps with respect to burrowing animals will be addressed during the Remedial Design phase of remediation of Landfills 2 and 17.</p>
<p>19. Page 7, second column, Alternative 4 — The information is essentially unchanged from the previous draft. Consequently my earlier comments have not been incorporated or addressed. Since this article still contains missing information, please refer to and address my September 17, 1998 comments in Section III, numbers 19, 21, 22, 23, and 24. In addition, the document does not state where the treated fine soils will be deposited.</p>	<p>RESPONSE 19: The paragraph describing Alternative 4 was updated to better increase the public's understanding of thermal desorption and thermal oxidation.</p>
<p>20. Page 7, second column, Alternative 4 - Please include definitions for the following treatment systems, 1) soil washing, 2) thermal destruction, 3) thermal desorption, and 4) thermal oxidation. Without these definitions the public is unable to understand the alternatives being described.</p>	<p>RESPONSE 20: The paragraph describing Alternative 4 was updated to better increase the public's understanding of soil washing, thermal destruction, thermal desorption and thermal oxidation. Definitions for thermal destruction and thermal desorption are also included on page 9 in the box titled, "Definitions of Chemical and Technical Terms."</p>
<p>21. Page 7, second column, Alternative 4 — The description does not state if a hazardous byproduct is formulated through thermal desorption and thermal oxidation. Nor does it state how the hazardous byproduct will be handled. To complete the alternative description, please include this information. Also note that this type of information was included for thermal destruction.</p>	<p>RESPONSE 21: The paragraph describing Alternative 4 was updated to better increase the public's understanding of thermal desorption and thermal oxidation.</p>
<p>22. Page 11, criteria 4 and 6, alternative 4 — The summary only mentions thermal destruction. Since thermal desorption and thermal oxidation are also part of this alternative, they should also</p>	<p>RESPONSE 22: To address all thermal processes (destruction, desorption and oxidation) the text for Criteria 4 in the Revised Draft Final Proposed Plan reads, "Reduces volume and toxicity by soil washing and thermal processes."</p>

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<p>be included in the summary. Please correct.</p>	<p>Criteria 6 reads, "Significant technical and administrative effort to treat soil and permit various thermal units."</p>
<p>23. Page 12 — As stated in my earlier comment (Section II, Comment 8), it is unclear why the section of applicable or relevant and appropriate requirements (ARARs) contain vague language, such as "potentially federal ARARs", "may be relevant and appropriate". It is suggested that the document either state why the wording is such or replace this section with a similar section from the May 1998 Proposed Plan for Inactive Landfills.</p>	<p>RESPONSE 23: The ARARs section has been updated and modified to eliminate vague language and to ensure that correct California Code of Regulation title and code numbers are cited. Also, please note that the ARARs write-up focuses only on Alternative 3, the preferred remedy.</p>
<p>24. Page 13, Internet connection — Please note that the "web" site, www.eltoro.usmc.mil does not contain a "BRAC" key. In several attempts, information on MCAS El Toro and the Installation Restoration Program could not be accessed. This is disturbing since the Proposed Plan states that this address will allow the user to access this type of information. Please correct.</p>	<p>RESPONSE 24: This web site is no longer active, it only serves as a "link" to the Marine Corps web site for MCAS Miramar. It will be deleted and not included in the Revised Draft Final Proposed Plan. The box will be revised and the SWDIV web site, which has information on MCAS El Toro (Restoration Advisory board meeting minutes, proposed plans, fact sheets) will be the featured web site.</p>



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CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

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

Document Control No.: CTO-0155/0412

File Code: 02221

TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 02R.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA. 92132-5190

DATE: February 19, 1999

CTO #: 155

LOCATION: MCAS El Toro

FROM:

Program/Project Manager

Operations Manager

DESCRIPTION: Response to Comments Draft Proposed Plan for Cleanup at Three Shallow Soil Sites,
Operable Unit 3, Sites 8, 11, and 12 - DTD February 1999

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(Cost) (Technical)

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O = Original Transmittal Sheet
C = Copy Transmittal Sheet
E = Enclosure (Letter, Response to Comments Draft Proposed Plan)

Date/Time Received

Bechtel

1230 Columbia Square
Suite 400
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CLEAN II Program
Bechtel Job No. 22214
Contract No. N68711-92-D-4670
File Code: 02221

IN REPLY REFERENCE: CTO-0155/0412

February 19, 1999

Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 02R.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA 92132-5190

Attention: G. Tinker, 5B02.GT, Contract Specialist

Subject: Response to Comments Draft Proposed Plan for Cleanup at Three Shallow Soil Sites, Operable Unit 3, Sites 8, 11, and 12, MCAS El Toro

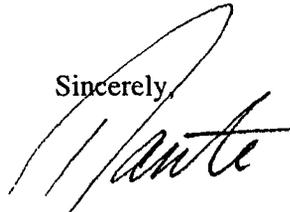
Dear Mr. Selby:

It is our pleasure to submit the Response to Comments for the Draft Proposed Plan for Cleanup at Three Shallow Soil Sites, Operable Unit 3, Sites 8, 11, and 12 for Marine Corps Air Station (MCAS) El Toro, California, prepared under Contract Task Order (CTO) 155 and Contract No. N68711-92-D-4670. Previously, the Draft Final Proposed Plan was submitted for regulatory agency concurrence on February 4, 1999. This brief document shows how Cal-EPA comments were responded to in the Draft Final Proposed Plan. U.S. EPA issues were discussed and resolved at BCT meetings.

The earliest concurrence of the 16-page Draft Final Proposed Plan (issued on February 4, 1999) was requested even though the regulatory agencies have 30 days (March 8, 1999) per the Federal Facility Agreement. Expedited concurrence was requested so the 30-day public comment period would end prior to April 7, 1999, which is also the scheduled submittal date for the Draft Record of Decision. Dates for the public comment period and public meeting will be established pending the earliest concurrence by the regulatory agencies. Upon concurrence, the Final Proposed Plan will be completed, with dates for the public comment period and the public meeting, and mailed to those on the MCAS El Toro project mailing list.

If you have any questions or would like further information, please contact Bob Coleman at (619) 744 3016, myself at (619) 744-3080.

Sincerely,



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

DJT/sp

Enclosures: Response to Comments Draft Proposed Plan for Cleanup at Three Shallow Soil Sites, Operable Unit 3, Sites 8, 11, and 12, MCAS El Toro, California



Bechtel National, Inc. Systems Engineers-Constructors

**RESPONSE TO COMMENTS
DRAFT PROPOSED PLAN FOR OPERABLE UNIT (OU)-3
SITES 8, 11, AND 12
MCAS EL TORO, CALIFORNIA**

<p>Originator: Tayseer Mahmoud, RPM DTSC</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: September 21, 1998</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0155 File Code: 0222</p>
<p><u>GENERAL COMMENTS</u></p> <p>The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated July 1998. The document describes the alternatives to clean up three shallow soil Sites 8 (Units 1 through 5), 11 (Unit 1 & 2), and 12 (Unit 3) at Marine Corps Air Station El Toro. The Proposed Plan (PP) identifies Alternative 3, Excavation with Recycling of the Excavated Soil as Cover Material for on-Station landfills, as the preferred alternative.</p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p>
<p>In addition to the verbal comments we provided during the conference call on September 15, 1998, this letter is to transmit written comments on this document. DTSC comments are as follows:</p>	
<p>1. Provide information from the Feasibility Study (FS) regarding the approximate number of cubic yards of contaminated soil to be excavated from each site.</p>	<p>RESPONSE #1. The approximate total of cubic yards of contaminated soil that is estimated for excavation was included in the Site-by-Site Summary table on page 5 for each site unit recommended for remedial action. The total number of cubic yards of contaminated soil estimated for excavation from Sites 8, 11, and 12 was included in the descriptions of Alternatives 3, 4, and 5 on page 7.</p>
<p>2. Provide information from the FS regarding the number of confirmation samples of the excavated soil that will be performed at each site in order to document that analyzed concentrations are not hazardous, and would allow the excavated soil to be hauled to landfill Sites 2 & 17.</p>	<p>RESPONSE #2. This will be addressed in the Remedial Action documents.</p>
<p>3. Provide information from the FS regarding the number of samples that would be collected from the bottom of the excavation of each site to confirm that all of the contaminated soil exceeding residential Risk Base Concentrations had been removed.</p>	<p>RESPONSE #3. This will be addressed in the Remedial Action documents.</p>
<p>4. Show the North arrow key on page 3, location map.</p>	<p>RESPONSE #4. Incorporated into the document.</p>

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PUBLIC PARTICIPATION COMMENT ON THE
DRAFT PROPOSED PLAN FOR CLEANUP AT
THREE SHALLOW SOIL SITES AT
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<p>Originator: Marsha Mingay, RPM DTSC</p> <p>To: Tayseer Mahmoud, RPM DTSC</p> <p>Date: September 17, 1998</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0155 File Code: 0222</p>
<p>COMMENTS</p> <p>I. <u>Changes to the May 1998 Proposed Plan for Closure of Inactive Landfills</u> - The draft Proposed Plan for Sites 8, 11 and 12 contain the preferred alternative of excavating contaminated nonhazardous soil and “recycling” the excavated soil to landfills at Sites 2 and 17. Since the May 1998 Proposed Plan does not include a cap foundation layer consisting of contaminated nonhazardous soil it evokes the National Contingency Plan (NCP) requirements addressing pre-record of decision (ROD) changes to the proposed plan (section 300.430(f)(3)(ii)(A) and (B), NCP).</p> <p>The above referenced section essentially divides pre-ROD significant changes into two categories, those changes which could be “reasonably anticipated” by the public and those changes which could not be reasonably anticipated”. It is the belief of DTSC Public Participation staff, that the use of nonhazardous contaminated soil as a cap foundation layer could not have been reasonably anticipated and therefore falls under section 300.430(f)(3)(ii)(B) of the NCP.</p> <p>According to the NCP, and as stated in EPA’s <u>Community Relations in Superfund: A Handbook</u> (January 1992) “... the [lead] agency must issue a revised proposed plan that includes a discussion of the significant changes and the reasons for such changes. The [lead] agency must seek additional public comment on the revised proposed plan” (page 16). Therefore, Public Participation requests that a revised Proposed Plan be circulated for review during a 30-day public comment period. Please note that the regulations are</p>	<p>RESPONSES TO COMMENTS</p> <p>RESPONSE #I: This issue was discussed at a teleconference among BCT members on September 15, 1998. Because soil that is not hazardous would be used as a foundation layer at the landfills at Sites 2 and 17 followed by capping, risk to human health and the environment would not increase or change. This explanation was incorporated into the Draft Final Proposed Plan on page 7 under “Recycling of Excavated Soil.” It was explained that no exposure pathway to people or animals and wildlife would be created during this activity. Also it is highly unlikely animals such as squirrels would burrow down four feet deep through the landfill cap to the foundation layer material.</p> <p>Moreover, BCT members concurred that the using soil that is not hazardous for the above-mentioned purpose does not present a “significant change.”</p>

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<p>silent regarding the need for a community meeting, therefore this activity is optional. It is anticipated that the public will be most interested in:</p> <ul style="list-style-type: none"> • public health and ecological impacts associated to a foundation layer consisting of nonhazardous contaminated soil, • full description of the cap (including depth of foundation layer and any precautions taken to preclude the foundation layer leaching into surrounding areas, • impact of bringing new contaminants to the landfills (Comparing the list of chemicals, as described in the two proposed plans, results in a conclusion that the contaminated soil contains several chemicals not currently in the landfills. These chemicals include herbicides, pesticides, cyanide and polychlorinated biphenyls.), and • impact to public highways • schedule for the various layers to be placed on the landfill. (In particular, what is the time interval between placement of the foundation layer and the remaining upper cap layers?) <p>As a suggestion, the proposed plan for the shallow soils sites could be written to serve both as the proposed plan for Sites 8, 11 and 12 and the revised proposed plan for landfill sites 2 and 17. If this action is taken, be sure that the publication of the proposed plan and newspaper announcements clearly indicate this.</p>	
<p>II. GENERAL COMMENTS</p> <p>1. The preferred alternative is explained without an assessment of risk</p>	<p>RESPONSES TO GENERAL COMMENTS</p> <p>RESPONSE #1: See Response to Comment, "I. Changes to the May 1998</p>

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<p>Originator: Marsha Mingay, RPM DTSC</p> <p>To: Tayseer Mahmoud, RPM DTSC</p> <p>Date: September 17, 1998</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0155 File Code: 0222</p>
<p>associated to landfill sites 2 and 17. Since the contaminated, nonhazardous, soil will remain on El Toro, it would be prudent to summarize findings regarding risk impacts (both to public health and the ecological receptors). This information should be included immediately after the following sentence "Once the sites have been remediated, ... because the contaminated soil will be recycled and will no longer present a threat to human health or the environment". If space does not permit the placement of information, then a reference to the appropriate page number, in the proposed plan, that contains this information should be included here.</p>	<p>Proposed Plan for Closure of Inactive Landfills." Also, at the end of the introductory article on page 1, readers are referred to page 7 where this issue is further explained.</p>
<p>2. To educate the public, please explain how contaminated soil can be non hazardous.</p>	<p>RESPONSE #2: Such an explanation would require a lengthy technical discussion that is not suitable for reader of this type of document. Readers are provided with a list of project representatives that they can contact if they want more information. Additionally, this was discussed at the 9/15/98 teleconference among BCT members and they concurred that further definition was not necessary.</p>
<p>3. To clarify the term "recycling"; demystify it by stating that the soil will be used at landfill sites 2 and 17 as a cap foundation layer. This information may need to be repeated throughout the document.</p>	<p>RESPONSE #3: This information has been repeated on pages 1, 6, and 7.</p>
<p>4. Clarify that the sites were divided into areas and that the entire site is being addressed in this proposed plan.</p>	<p>RESPONSE #4: Comment was incorporated into the document. Now it is clear to the reader that these sites were divided into units based on physical characteristics and various activities performed at specific portions of each site.</p>
<p>5. In the Investigation Results section, the descriptions for each site do not state the depth of non detect. It gives vague descriptions such as "generally confined", "most frequently between depths of 0 to 4 feet bgs" and "reported in shallow soil". Without defining the extent of contamination, the reader cannot comprehend how the</p>	<p>RESPONSE #5: This was discussed at the 9/15/98 teleconference among BCT members and they concurred that the level of explanation was appropriate. The extent of contamination is included in the Site-by-Site summary table on page 5 for those sites/units with a recommended remedial action. Approximate amount of cubic yards of contaminated soil that would be</p>

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<p>contaminates are dispersed. Please define the areas.</p>	<p>excavated is listed. Also, the italic type following the "Investigation Results" section advises readers to consult the Draft Final Remedial Investigation Report for more detailed information on investigation findings. It also refers readers to page 13 to the sidebar that explains where community members can go and review reports and other documents, and to page 15 to the item, "Where to Get More Information" that lists project representatives with addresses and phone numbers.</p>
<p>6. The information in the Investigation Results is essential for the public to understand the current site description. Unfortunately the current wording in pages 2 and 3 is very hard to understand. It is believed that the problem stems from having so many units to discuss for each site. In order for me to understand the information, I created a separate table which enabled me to "see" the information being presented. Part of this table is shown below. It is suggested that the text be simplified and/or a visual tool be used to assist the reader in understanding this information.</p>	<p>RESPONSE #6: See Response to Comment #5.</p>

Site 12	Unit 1		Unit 2		Unit 3		Unit 4	
	--' bgs	--' bgs	--' bgs	--' bgs	0-5' bgs	--' bgs	--' bgs	5-_' bgs
VOCs	x	unknown	x	unknown	x	x	unknown	unknown
SVOCs	-	unknown	x	unknown	x	x	unknown	unknown

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<p>7. Please ensure that sufficient information is available so that the reader can understand the decisions to remove soil at one unit and not at another unit with similar risks. Andy Piszkin's and Glen Kistner's emails of September 11, 1998 reflect this concern. However, the tentative conclusions still result in different decisions although risks are relatively similar (see my comment III.13).</p>	<p>RESPONSE #7: The Site-by-Site Summary table was expanded and now consists of five columns. Each unit is individually described. Column 1 – "Site/Unit" each are clearly designated; Column – 2 "Cancer Risk" includes health risk estimates; Column 3 – "Noncancer Risk" includes health risk estimates; a Column 4 – "Risk Management Considerations" briefly provides the rationale for recommended actions; and Column 5 – "Recommended Actions" states that either No Further Action or Proposed Remedial Action is proposed and included with the approximate amount of soil (cubic yards) that would be excavated from each unit with a recommended action.</p>
<p>8. It is unclear why the section on applicable or relevant and appropriate requirements (ARARs) contain vague language, such as "potentially federal ARARs", "may be relevant and appropriate", etc. To avoid leaving the reader with this uncertainty, please either add information which informs the reader why it is unknown or replace this section with the similar section from the May 1998 Proposed Plan for Inactive Landfills.</p>	<p>RESPONSE #8: The term "potential ARAR" should be used all the way throughout the Remedial Investigation/Feasibility Study and Proposed Plan process to the Record of Decision when the final ARAR determination is made. This provides the community with an opportunity to comment on the proposed ARAR determination.</p>
<p>III. SPECIFIC COMMENTS</p>	<p>RESPONSES TO SPECIFIC COMMENTS</p>
<p><u>Page 2</u></p> <p>1. To assist the reader in understanding the sites, please include the area number, in parenthesis, after each description (e.g., Site 8, "... an old salvage yard (Unit 5) and a main storage yard (Unit 2).")</p>	<p>RESPONSE #1: Unit numbers of the specific portions of each site were included in the text of the Site Background write-up on page 2 in a similar manner as suggested.</p>
<p>2. Clarify the wording in Site 8's description of scrap materials. The wording currently suggests that the scrap materials contain various types of liquids. Is this correct? If not, please correct. Additionally, if the scrap materials do contain liquids, please describe them in the Investigation Results section.</p>	<p>RESPONSE #2: Wording was modified by adding the word "stored." The second sentence of the Site 8 description now reads, "The scrap materials stored include mechanical and electrical components and various types of liquids."</p>
<p>3. Site 8 Site Background does not contain a description of Units 1 and</p>	<p>RESPONSE #3: Comment noted, see Response to Comment - III. Specific</p>

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<p>4. Please include this information.</p>	<p>Comments, Page 2 (Comment No. 1 above).</p>
<p>4. Site 11 Investigative Results (see page 3) mentions pesticides, however, the Site Background description does not lead one to suspect this type of chemical. Please include additional information which clarifies why pesticides were found at Site 11.</p>	<p>RESPONSE #4: The text in the first paragraph of the Investigation Results was modified to explain that the PCB analysis (laboratory tests) of soil samples also checks for pesticides.</p>
<p>5. Define "drying beds", a term first used in Site 12 Background. To further educate the reader and increase comprehension, include any equipment associated to this process.</p>	<p>RESPONSE #5: No additional equipment is used. The text was modified to read, "The sludge produced at this facility was deposited in two areas (Units 1 and 2) to dry the material (drying beds)."</p>
<p>6. Reword the second paragraph for Site 12 Background to read, "An The industrial wastewater treatment plant was also present at Site 12. This plant treated ..."</p>	<p>RESPONSE #6: Inserted "(Unit 4)" to provide needed clarification. The sentence now reads, "An industrial wastewater treatment plant (Unit 4) was also present at Site 12 adjacent to the sewage treatment plant."</p>
<p>7. The last sentence in the second paragraph for Site 12 Background states, "No evidence of ... is visible today ..." This sentence allows the reader to believe there may be contamination which is not visible. Please reword or clarify.</p>	<p>RESPONSE #7: Sentence was re-written into two sentences and now reads, "Treatment plant facilities are no longer present at the site. This area is currently a grassy picnic area and park."</p>
<p><u>Page 3</u></p> <p>8. When describing Investigative Results, please combine the information when ever possible. For instance, Site 12, Unit 3 has the same chemicals of concern (COCs) as Units 2 and 4. Therefore, wording could be simplified by stating, "Site 2, 3 and 4 contain ..." versus listing the COCs twice, once for Units 2 and 4 and then again for Unit 3.</p>	<p>RESPONSE #8: This suggestion was incorporated into the text on page 3 providing for improved readability.</p>
<p>9. Site 12 Remedial Investigation summary contains a sentence which appears to be out of context. Please research and correct the following sentence's placement in this document. "The present grade throughout Units 1, 2, and 4 is approximately 5 feet higher</p>	<p>RESPONSE #9: The sentence was deleted, it offered no additional value and understanding for readers.</p>

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<p>than the original ground surface present during the operational period of the sludge beds and the wastewater treatment plant.”</p>	
<p><u>Page 4</u></p> <p>10. In the first paragraph of “Identifying Exposure Pathways” the last sentence should be modified by adding the following words, “... health effects from exposure to chemicals <i>over a long period of time</i> were evaluated and combined ...”</p>	<p>RESPONSE #10: Comment noted. This is explained in this section and the next section “Estimating Human Health Risks.” The process involves evaluations of the concentrations detected, then estimates for risk over of exposure to the various chemicals over a period of 30 years.</p>
<p>11. Please note that the definition for “Metals” is site specific while the definitions for the other terms are generic.</p>	<p>RESPONSE #11: Comment noted.</p>
<p>12. I concur with the “Site-by-Site Summary” as shown in the September 8, 1998 draft meeting minutes. This summary clarifies and simplifies the language found in the Risk Assessment Results. However, please ensure that the information clearly supports the conclusion. This does not occur in Site 8, Units 2 and 3. The table shows the same risk for both sites and yet only a portion of Unit 3 is being removed. The reader will not readily understand the difference in decisions for two seemingly situations.</p>	<p>RESPONSE #12: In the latest Site-by-Site Summary table, risk drivers are explained for both Unit 2 and 3 in the “Risk Management Considerations” column. Information incorporated clearly supports the actions listed in the “Recommended Actions” column. The text in the table now reads as follows:</p> <p><u>Risk Management Considerations</u> - At Unit 2, the only risk drivers present are arsenic and manganese. No site-related activities involved use of these metals. Arsenic and manganese occur naturally in native soil on and off MCAS El Toro property.</p> <p><u>Recommend Actions</u> – No Further Action</p> <hr/> <p><u>Risk Management Considerations</u> - At Unit 3, soil beneath the refuse pile formerly located at this unit was contaminated with PCBs. During construction activities, prior to the remedial investigation, most of the PCB-contaminated soil was removed. Sampling performed during the remedial investigation indicates not all of the PCB-contaminated soil was removed.</p> <p><u>Recommend Actions - Proposed Remedial Action</u> –remove remaining PCB-contaminated soil (approx. 365 cubic yards)</p>

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<p><u>Page 6</u></p> <p>13. The bold printed material needs to be modified in order to remain consistent with latter terminology. Please rewrite the sentence to read, "... be used as a foundation layer soil material beneath ..."</p>	<p>RESPONSE #13: Incorporated comment to provide for consistency.</p>
<p>14. The description within Alternative 2 states that the "covenant would prohibit future owners from operating day care centers at the sites and from ..." While this sentence is technically correct, the specific mention of "day care centers" is misleading and limiting. Better wording would be "The covenant would limit use to industrial activities which are protective of the cap and would allow continued maintenance and inspection."</p>	<p>RESPONSE #14: The last sentence of the paragraph was modified to read, "The covenant would limit use at the site to industrial activities and also allow Marine Corps and regulatory personnel access to the site to maintain or inspect the cap." This is the most likely scenario for such an alternative but it is possible that engineering controls could be incorporated into a covenant to allow more flexible use of the site than industrial use.</p>
<p>15. For Alternative 3, please state the target level for clean up. This would assist the reader in their attempts to understand and formulate comments regarding the preferred alternative approach. (The Proposed Plan currently states, "... soil sampling would be performed to confirm that all of the contaminated soil that could cause an unacceptable risk to human health has been removed." The public may want to know the number associated with the "unacceptable risk" (or risk based concentrations for residential use). This is further confused by the fact that we are proposing to clean up sites with risk ranges in the acceptable range (defined on page 5 as 1/10,000 to 1/1,000,000) without clear justification.</p>	<p>RESPONSE #15: The Human Health Risk Assessment on page 4 provides readers with a general introduction and understanding of the risk assessment role. Also, brief descriptions of the site units that are of concern are discussed. On the facing page (page 5), the Site-by-Site summary table is presented along side page 4. This table provides specific information on health risks for each site unit and the recommended actions. Actual concentration target levels for cleanup will be based on the sampling design for site closeout. This will be established in the Remedial Action phase.</p>
<p>16. To separate different stages of the cleanup process, please create a new paragraph starting with the last partial sentence on page 6. This sentence begins with, "Upon completion of remedial activities, the backfilled soil ..."</p>	<p>RESPONSE #16: This paragraph was split into two paragraphs.</p>

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<p><u>Page 7</u></p> <p>17. Insert “(see Map on page 3)” immediately after the second to the last sentence within “Recycling of Excavated Soil”.</p>	<p>RESPONSE #17: In the Draft Final, at the end of all the alternative descriptions, the reader is referred to the remedial action diagrams for all the alternatives. The reference clearly stands out and reads, “Diagrams that show areas recommended for remedial action are on pages 8 and 9.”</p>
<p>18. As stated in my earlier comment (II.1), please explain the statement, “and would not increase the risks at the landfill sites.” (See the last sentence in “Recycling of Excavated Soil”).</p>	<p>RESPONSE #18: See Response to Comment, “I. Changes to the May 1998 Proposed Plan for Closure of Inactive Landfills.” Also, at the end of the introductory article on page 1, readers are referred to page 7 where this issue is further explained.</p>
<p>19. The current description of soil washing for Alternative 4 and 5, leaves the impression that it merely separates the fine materials from the coarser particles. According to “Treatment Technologies Applications Matrix for Base Closure Activities” (November 1994; Revision 1), this is incorrect. If the “treatment” includes two phases; namely separating particle size and then soil washing to remove contaminants from the finer particles, please add sufficient information to inform the reader of the process. If the “treatment” consists of only separating the particles into two piles, please reword the “treatment” process to be “separation.” And, if the coarser particles are also treated through soil washing, please tighten wording to eliminate any possible confusion.</p>	<p>RESPONSE #19: Comment noted. The description of soil washing is complete, accurate, and of suitable length for a Proposed Plan document. A reference will be added in the Final Proposed Plan, at the bottom of page 7, that refers readers to consult the Draft Final Feasibility Study Report for further technical information and page 13 in the Proposed Plan explains where community members can review this document.</p>
<p>20. The following sentence leads the reader to believe that only the finer particles will undergo soil washing. If this is incorrect, please change the wording to eliminate possible misunderstanding. “Since the fine-grained soils are expected to contain the bulk of the contamination, this will reduce the volume of soil requiring further treatment.”</p>	<p>RESPONSE #20: Refer to Response #19.</p>

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<p>21. Support the rationale behind the following statement, "... the fine-grained soils are expected to contain the bulk of the contamination".</p>	<p>RESPONSE #21: Refer to Response #19.</p>
<p>22. If only the finer particles are subject to soil washing, please correct the statement, "The treated (clean) coarser soil ..."</p>	<p>RESPONSE #22: Refer to Response #19.</p>
<p>23. State what will be done to ensure that the coarse material is "clean". If samples will be taken, please either refer them to a section regarding target cleanup levels or provide that information within this area of the Proposed Plan.</p>	<p>RESPONSE #23: Refer to Response #19.</p>
<p>24. Concern about dioxins have been expressed during past RAB meetings. To avoid possible undue concern, please state for Alternative 4, how the creation of dioxins would be avoided.</p>	<p>RESPONSE #24: The Navy does not recall dioxins being an issue at past MCAS El Toro RAB meetings. It is not necessary to include this discussion.</p>
<p>25. For Alternative 5, see my comments 21 and 23.</p>	<p>RESPONSE #25: Refer to Response #19.</p>
<p><u>Page 8</u></p> <p>26. To increase access of information within the Proposed Plan, insert "(see page 10 and 11)", at the end of the last sentence for criteria two.</p>	<p>RESPONSE #26: A reference was provided to assist readers.</p>
<p>27. Add the following words to clarify information for criteria 3, "... if the asphalt cap at Sites 8 and 11 and soil cap at site 12 is properly inspected ..."</p>	<p>RESPONSE #27: Incorporated comment to provide further clarification.</p>
<p>28. In comparing the information for criteria 4 with the criteria 4 language from the Landfill's Proposed Plan, this alternative would also reduce toxicity and volume. This needs to be assessed and if applicable, the language in this Proposed Plans needs to be corrected. If the toxicity and volume will not be reduced, please be prepared to answer questions regarding this possible contradiction.</p>	<p>RESPONSE #28: With regard to Sites 8, 11, and 12, toxicity and volume are reduced at these three sites.</p>

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<p>29. Please refer the reader to the appropriate section which substantiates the last sentence in criteria 4. This sentence states, "... and would not increase the risks at the landfill sites."</p>	<p>RESPONSE #29: Incorporated comment. The reader is referred to the appropriate section. The last sentence now ends with, "... (see page 7 "Recycling of Excavated Soil")."</p>
<p><u>Page 9</u></p> <p>30. The following are comments for the Comparative Analysis of Remedial Alternatives.</p> <ul style="list-style-type: none"> a. Line 1; alternatives 4 and 5, add the word "treatment" after "removing" b. Substantiate the subjective term, "significant" found in line 6, alternatives 4 and 5 c. Line 8, include information for all alternatives 	<p>RESPONSE #30:</p> <ul style="list-style-type: none"> (a) Comment noted, the use of the word "treating" in Line 1, Alternatives 4 and 5 is consistent with Line 3, Alternatives 4 and 5. (b) The term "significant" modifies "LOW" directly above and is consistent with the "6. Implementability - . . ." section of the "Evaluation of Alternative 3 – the Preferred Remedy" on page 10 of the Draft Final. This discussion explains how the alternatives differ significantly in implementability. Alternatives 4 and 5 involve using more complex technologies of soil washing and/or thermal destruction/thermal desorption. In addition, for Alternative 4, a significant amount of resources are expected to be expended in the effort to permit a thermal destruction unit at Site 8. (c) Information was included for all alternatives. Alternative 1 reads, "The State cannot accept this alternative." Alternatives 2, 3, 4, and 5 read, "The State can accept this alternative."
<p><u>Page 10</u></p> <p>31. Please note that the format for the three introductory bullets is not consistent.</p>	<p>RESPONSE #31: Comment noted. Language used here is from U.S. EPA guidance documents and has been included in this manner in previous MCAS El Toro Proposed Plans.</p>
<p>32. It would be helpful to draw lines around the bold face text found in the bottom left hand section of page 10. This will further separate this information from the surrounding article.</p>	<p>RESPONSE #32: Comment noted. In the Draft Final Proposed Plan, this article is now on page 13 and it clearly stands out as a separate item.</p>

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<p>33. For chemical-specific ARARs and federal/state location-specific ARARs, explain why none are applicable.</p>	<p>RESPONSE #33: For these categories there are no potential ARARs that apply to Sites 8, 11, and 12 at MCAS El Toro that have been identified by Cal-EPA.</p>
<p><u>Page 11</u></p> <p>34. Eliminate "(TBC)" since the acronym is not used in the text.</p>	<p>RESPONSE #34: The TBC acronym was eliminated.</p>
<p><u>Page 12</u></p> <p>35. Please correct the title of DTSC's public participation contact. It should read, "Public Participation Specialist".</p>	<p>RESPONSE #35: Title was corrected.</p>



BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

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

Document Control No.: CTO-0155/0447

File Code: 02221

TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 02R.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA. 92132-5190

DATE: March 17, 1999

CTO #: 155

LOCATION: MCAS El Toro

FROM:

[Handwritten signature]

Program/Project Manager

Operations Manager

DESCRIPTION: Response to Comments on the Draft Final Proposed Plan for Cleanup at Three
Shallow Soil Sites, Operable Unit 3, Sites 8, 11, and 12 - DTD March 17, 1999

TYPE: Contract Deliverable (Cost) X CTO Deliverable (Technical) Other

VERSION: Final REVISION #: [Handwritten mark]

ADMIN RECORD: Yes X No Category Confidential

SCHEDULED DELIVERY DATE: N/A ACTUAL DELIVERY DATE: 3/17/99

NUMBER OF COPIES SUBMITTED: OE/7C/7E

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O = Original Transmittal Sheet
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E = Enclosure (Letter, Response to Comments
Draft Final Proposed Plan

Date/Time Received

Bechtel

1230 Columbia Square
Suite 400
San Diego, CA 92101

CLEAN II Program
Bechtel Job No. 22214
Contract No. N68711-92-D-4670
File Code: 02221

IN REPLY REFERENCE: CTO-0155/0447

March 17, 1999

Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 02R.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA 92132-5190

Attention: G. Tinker, 5B02.GT, Contract Specialist

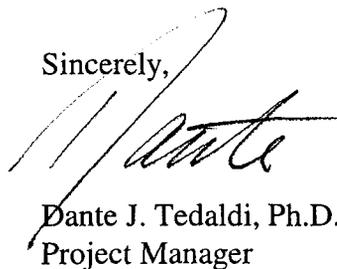
Subject: Response to Comments on the Draft Final Proposed Plan for Cleanup at Three Shallow Soil Sites, Operable Unit 3, Sites 8, 11, and 12

Dear Mr. Selby:

It is our pleasure to submit the Response to Comments for the Draft Final Proposed Plan for Cleanup at Three Shallow Soil Sites, Operable Unit 3, Sites 8, 11, and 12 for Marine Corps Air Station (MCAS) El Toro, California, prepared under Contract Task Order (CTO) 155 and Contract No. N68711-92-D-4670. These Response to Comments show how the Department of the Navy has responded to comments received from Cal-EPA Department of Toxic Substances Control (DTSC) on the Draft Final Proposed Plan. Some comments were incorporated into the Revised Draft Final Proposed Plan which was provided under separate cover. U.S. EPA issues were discussed and resolved at BRAC Cleanup Team meetings. For your convenience, previously distributed Response to Comments on the Draft Proposed Plan (February 19, 1999) are included.

If you have any questions or would like further information, please contact Bob Coleman at (619) 744-3016, myself at (619) 744-3080.

Sincerely,



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

DJT/sp

Enclosures: Response to Comments Draft Proposed Plan for Cleanup at Three Shallow Soil Sites, Operable Unit 3, Sites 8, 11, and 12



Bechtel National, Inc. Systems Engineers-Constructors