

Installation Restoration Program

Public Information Materials

4/21/99

Restoration Advisory Board Meeting held at Irvine City Hall Irvine, CA

Materials/Handouts Include:

- RAB Meeting Agenda/Public Notice – 3/21/99 RAB meeting.
- RAB Meeting Minutes – 1/27/99 RAB meeting and Attachment (*Minutes approved at the 4/21/99 meeting; attachment with comments is included*).
- Navy and Marine Corps – Internet Access, Environmental Web Sites.
- DoD - Environmental Base Realignment and Closure Web Site Publications List.
- MCAS El Toro Installation Restoration Program Mailing List Coupon.
- MCAS El Toro – Meeting Schedule, Full RAB and RAB Subcommittee, January-August 1999.
- Response letter, dated December 22, 1998 to Mr. Greg Hurley, Co-Chair El Toro Restoration Advisory Board, from Ms. Sherri W. Goodman, Deputy Under Secretary of Defense (Environment Security), concerning the level of funding provided to the State of California by the Department of the Navy through the Defense and State Memorandum of Agreement (DSMOA) for regulatory oversight of Navy environmental cleanup activities.
- MCAS El Toro Restoration Advisory Board Mission Statement and Operating Procedures, dated July 31, 1996.
- Subcommittees section handout excerpted from the MCAS El Toro Restoration Advisory Board Mission Statement and Operating Procedures, dated July 31, 1996.
- MCAS El Toro RAB Subcommittees – Chairperson Summary and Member Summary.
- Response letter, dated April 14, 1999 to the Honorable Marcia Rudolph, Councilwoman from the City of Lake Forest (and RAB member), from Charles V. (Chuck) Smith, Chairman of the Board of Supervisors, Supervisor, First District, County of Orange, regarding inactive Landfill Sites 3 and 5 at MCAS El Toro and her comments on the investigation and remediation of these landfill sites by the Department of the Navy.
- *Presentation* - Remediation of Shallow Soil Sites, Installation Restoration Program, Sites 8, 11, and 12, MCAS El Toro, given by Dave DeMars, Remedial Project Manager (RPM), Southwest Division Naval Facilities Engineering Command (SWDIV).

Agency Comments - U.S. Environmental Protection Agency (U.S. EPA)

- Re: Marine Corps Air Station (MCAS) El Toro, Federal Facility Agreement (FFA) Schedule Change Request, (letter dated March 26, 1999).

Agency Comments – California Environmental Protection Agency (Cal-EPA)

- Cal-EPA Department of Toxic Substances Control (DTSC), Comments on Draft Planning Document for the OU-3B Phase II Remedial Investigation/Feasibility Study, MCAS El Toro (letter dated February 11, 1999).

- Cal-EPA DTSC, Request for Extensions to the Federal Facilities Agreement (FFA) Schedules, Operable Unit (OU) 2B Landfill Sites 2 and 17, OU-3 Sites 8, 11, and 12, and OU-3 Sites 7 at 14 MCAS El Toro (letter dated March 12, 1999).
- Cal-EPA DTSC, Request for Land Use Covenant for Landfill Sites 3 & 5 Record of Decision, MCAS El Toro (letter dated March 12, 1999).
- Cal-EPA DTSC, Closure Report Approval – Temporary Accumulation Area (TAA) 77 at MCAS El Toro (letter dated March 9, 1999).
- Cal-EPA DTSC, Comments on Draft Operation and Maintenance Manual, Soil Vapor Extraction (SVE) System Demonstration, Site 24, MCAS El Toro (letter dated March 10, 1999).
- Cal-EPA DTSC, Closure Report Approval – Temporary Accumulation Area (TAA) 314 at MCAS El Toro (letter dated March 16, 1999).
- Cal-EPA DTSC, Comments on Technical Memoranda for Oil Water Separators (OWSs) 244, 388C, 392, 562, and 676, Underground Storage Tanks (USTs) 673B and 380B, and Solid Waste Management Unit (SWMU) 273 at MCAS El Toro (letter dated March 17, 1999).
- Cal-EPA DTSC, Request for Extensions to the Federal Facilities Agreement (FFA) Schedules, Operable Unit (OU) 1 and OU-2A Sites 18 and 24 at MCAS El Toro (letter dated March 30, 1999).

**MCAS El Toro
Restoration Advisory Board
Meeting**

21 April 1999 6:30-9:00 PM
(Rescheduled from 31 March 1999)
Irvine City Hall
Conference and Training Center
One Civic Center Plaza, Irvine

AGENDA

Question and Answer (Q&A) Ground Rules

- **Q&A follows individual presentations; time designated for presentations includes Q&A time.**
 - **Open Q&A session (environmental topics) is at the end of the New Business segment.**
 - **After meeting adjournment, Navy and Marine Corps representatives are available to answer additional questions.**
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Welcome/Introductions/Agenda Review (6:30-6:35)	Joseph Joyce Marine Corps/Navy RAB Co-chair		
Old Business (6:35-6:50)			
Approval of 1/27/99 Minutes (6:35-6:40)	Greg Hurley RAB Community Co-chair		
Announcements (6:40-6:45)	Joseph Joyce & Greg Hurley		
Subcommittee Meeting Report (6:45-6:50)	Greg Hurley & Subcommittee Chair		
New Business (6:50-8:40)			
Regulatory Agency Comment Update (6:50-7:05)	Glenn Kistner U.S. EPA	Tayseer Mahmoud Cal-EPA DTSC	Patricia Hannon RWQCB
Update on the February 1999 DRTF Meeting (7:05-7:25)	Joseph Joyce & Don Zweifel & Greg Hurley RAB Member		
RAB Subcommittee Responsibilities (RAB Mission Statement) (7:25-7:45)	Joseph Joyce & Greg Hurley		
Update on Landfill Sites 2 and 17 (7:45-8:00)	Joseph Joyce		
5 MINUTE BREAK (8:00-8:05)			
Update on OU-3 Sites 8, 11, and 12 (8:05-8:15)	Dave DeMars U.S. Navy/Southwest Division		
Landfill Sites 3 and 5 Draft Record of Decision - Change to Alternative 4D (8:15-8:40)	Joseph Joyce & Glenn Kistner & Tayseer Mahmoud & Patricia Hannon		
Open Q&A (Environmental Topics) (8:40-8:50)	Joseph Joyce		
Meeting Summary & Closing (8:50-9:00)	Greg Hurley & Joseph Joyce		
Meeting Evaluation & Suggested Topics for Future Meetings			

PUBLIC NOTICE

**MARINE CORPS AIR STATION
EL TORO**

Restoration Advisory Board Meeting



The Restoration Advisory Board (RAB) is composed of concerned citizens and government representatives involved in the environmental cleanup program at MCAS El Toro. Your participation and input is important and appreciated.

**Wednesday, April 21, 1999
6:30 - 9:00 p.m.**

**Irvine City Hall
Conference and Training Center
One Civic Center Plaza, Irvine
(Rescheduled from March 31, 1999)**

This meeting will feature the following activities and presentations:

- ***Restoration Advisory Board Subcommittee Responsibilities
(RAB Mission Statement)***
- ***Landfill Sites 3 and 5 Draft Record of Decision - Change to
Alternative 4D***
- ***Update on Landfill Sites 2 and 17***
- ***Update on Operable Unit 3 Shallow Soil Sites 8, 11, and 12***



For more information about this meeting and the Installation Restoration Program at MCAS El Toro, please contact:

Commanding Officer
AC/S, Environment (1AU)
Attn: Mr. Joseph Joyce, MCAS El Toro
P.O. Box 95001, Santa Ana, CA 92709-5001
(949) 726-3470 or 726-2840

MARINE CORPS AIR STATION EL TORO
RESTORATION ADVISORY BOARD MEETING

January 27, 1999

MEETING MINUTES

The 37th Restoration Advisory Board (RAB) meeting for Marine Corps Air Station (MCAS) El Toro was held Wednesday, January 27, 1999 at the Irvine City Hall. The meeting began at 6:32 p.m. These minutes summarize the discussions and presentations from the meeting.

WELCOME, INTRODUCTIONS, AGENDA REVIEW

Mr. Joseph Joyce, Marine Corps RAB Co-Chair, opened the meeting, and RAB member Marcia Rudolph led the group in the Pledge of Allegiance. Mr. Joyce welcomed everyone in attendance, and reminded the group to sign in so all those present will receive a copy of the meeting minutes and the next RAB meeting agenda. Following self-introductions made by all in attendance, Mr. Joyce provided an overview of the meeting agenda.

OLD BUSINESS

Review and Approval of December 2, 1998 Meeting Minutes

The RAB approved the minutes, but agreed to add comments from Marsha Mingay, Cal-EPA, Public Participation Specialist, as an attachment to the minutes. The RAB Co-Chairs and members concurred that with the attachment, the minutes were approved.

Announcements

- For those interested in redevelopment issues at MCAS El Toro, Mr. Joyce provided RAB members with the key point-of-contact: Ms. Courtney Wiercoch, Development Program Manager, El Toro Master Development Program, (714) 834-4000.
- The schedule for full RAB and RAB subcommittee meetings was provided (January-August 1999).
- A tour of Site 24, VOC Source Area, is being organized for RAB members and other interested individuals for Saturday, February 27, 1999. A flyer and sign-up form was provided. The tour will only take place if there is enough interest.

Subcommittee Report

Dr. Chuck Bennett, RAB member, said the last subcommittee meeting was held in October 1998. Budgetary and expenditure issues for the environmental cleanup at MCAS El Toro were discussed in detail. Participation of Andy Piszkin, Lead Remedial Project Manager, and Mr. Joyce was most appreciated. He said the subcommittee should plan on meeting again in February 1999 and RAB members need to start thinking about topics for discussion.

NEW BUSINESS

◆ Regulatory Agency Comment Update

Glenn Kistner, Project Manager, U.S. EPA

Mr. Kistner said U.S. EPA's comments on recent document reviews were provided for RAB members at the sign-in table. He said U.S. EPA has approved the Draft Final Engineering Design Report for Vadose Zone Remediation at Site 24. The Draft Proposed Plan for Groundwater Remediation at OU-1 Site 18 and OU-2A Site 24 was also reviewed and a draft final will be prepared for agency concurrence. It is anticipated that this plan will go out for public review in March or April. A Draft Technical Memorandum, Evaluation of Metals Concentration in Groundwater was also reviewed. It was thought at one time metals contamination may be a problem with the groundwater but now it has been determined that metals found are typical for when monitoring wells have stainless steel well casings. These metals have leached out from the well casings. He said U.S. EPA also provided comments on the planning documents for the Remedial Investigation/Feasibility Study for Operable Unit 3, Sites 7, 14, and 16. Key documents include the Field Sampling Plan and the Quality Assurance/Quality Control Plan. U.S. EPA also provided comments on the Draft Record of Decision (ROD) for Sites 2 and 17. He said Dept. of Navy (DoN) responses to Draft Groundwater Monitoring Plan were also reviewed.

Tayseer Mahmoud, Project Manager, Cal-EPA Dept. of Toxic Substances Control (DTSC)

Mr. Mahmoud provided Cal-EPA DTSC written comments for RAB members. He said DTSC reviewed and approved the Closure Report for Solid Waste Management Unit 244 at the Station. This area was used for storage of an electrical transformer and a release of polychlorinated biphenyls (PCBs) occurred but it is now approved for unrestricted use. He said DTSC also approved the Draft Final Engineering Design Report for Vadose Zone Remediation at Site 24. He said that as each phase of remedial action is constructed, as-built drawings must be submitted to the regulatory agencies for review. DTSC also provided comments on the Draft Proposed Plan for Groundwater Remediation at OU-1 Site 18 and OU-2A Site 24. He said DTSC agrees with the proposed selection of Enhanced Alternative 8 and Alternative 10B' (*pronounced 10B prime*). He noted that the final selection would be made after comments are received from the public. DTSC also considers any "pretreatment" of VOC-contaminated groundwater that emanates from the Station to be considered part of the federal Comprehensive Environmental Response and Compensation and Liability Act (CERCLA) cleanup remedy for this groundwater. DTSC also granted extensions to the Federal Facilities Agreement (FFA) requested by the DoN. The first extension was for submitting Draft Final Proposed Plan for Sites 8, 11, and 12 for agency review. This also includes review of a Technical Memorandum on Risk Management Considerations at these sites. The second extension was the Draft ROD for Sites 3 and 5 (landfills). With the three-and-a-half month extension, this document is now due to the regulatory agencies by March 15, 1999.

Patricia Hannon, Project Manager, Regional Water Quality Control Board (RWQCB)

Ms. Hannon said the RWQCB has reviewed the same documents as DTSC. Also, five closure reports for underground storage tanks and clarifiers were also reviewed. A RAB member requested that RWQCB check to see if MTBE had been reported at the Station and if this impacts any remediation activities. She said she would comply with the request and brief the RAB at the next meeting.

Mr. Joyce also introduced Mr. Peter Janicki, Integrated Waste Management Board (IWMB). This state agency is involved in reviewing landfill documents at MCAS El Toro. He said he had no comments to offer tonight.

◆ Public Briefing – VOC Source Area Cleanup Determination – Dave DeMars, Remedial Project Manager, Southwest Division Naval Facilities Engineering

Mr. DeMars provided the RAB with several handouts pertaining to his presentation and stated that he was at the meeting to discuss the soil remediation to be performed at the VOC Source Area, Site 24. The purpose of his presentation was twofold: (1) to update the RAB on Site 24, and (2) DoN is required by the National Contingency Plan (NCP) to notify the public 45 days prior to starting remedial action at any Installation Restoration site.

DoN has accomplished the notification in two ways. On January 9, 1999, a public notice was placed in both the *Orange County Register* and the *Los Angeles Times* (Orange County edition). A fact sheet has been published and will be mailed to approximately 2,000 people on the MCAS El Toro mailing list. (*The fact sheet was mailed on Feb. 17, 1999*). The NCP also requires the DoN to give a public briefing, hence, the presentation at the RAB meeting that is open to the public.

Site 24 Background and History

At first, trichloroethene (TCE), an industrial solvent, was discovered in the groundwater off-Station in an Orange County Water District (OCWD) well. Next, a series of investigations identified MCAS El Toro as a possible source of the TCE plume in groundwater. As a result of further investigations, the source of TCE contamination was narrowed down to Site 24, specifically the tarmac and around aircraft maintenance hangers, Buildings 296 and 297. The investigations show elevated concentrations of VOCs in both the soil and the groundwater. In conjunction with a remedial investigation, a feasibility study was performed. After public comment, the use of Soil Vapor Extraction (SVE) technology was selected as the remedy for VOC-contaminated soil at the site. Mr. DeMars explained that the SVE system acts as a giant vacuum that is applied to a series of underground extraction wells and pulls the VOC vapors up through the soil, up through the well, and out into a treatment system. He added that SVE is a U.S. EPA presumptive remedy for cleanup of VOCs. Presumptive remedies are cleanup technologies preferred by the U.S. EPA. They are used for sites that have similar characteristics such as the types of contaminants, disposal practices used or similar environmental impacts.

A series of SVE pilot tests were conducted for two purposes: (1) to evaluate the feasibility of using the SVE at Site 24, and (2) to establish some baseline operating parameters at the site. DoN would like to determine what type of radius of influence from each well, which in turn will determine the relationship between the vacuum and the pressure. Pilot testing also measures the initial VOC concentrations in the soil and calculates the rate of removal of the mass of VOCs in soil. Overall, 21 SVE wells were installed in areas of highest VOC concentrations and pilot tests removed over 800 pounds of TCE from the vadose zone.

The initial well to be pilot tested was 24SVE-1. This test was performed over a 19-day period as part of the Phase II Feasibility Study. During that period, TCE concentrations in the well dropped from 1150 micrograms per liter to 402 micrograms per liter. A total of 225 pounds of TCE was removed during this pilot test. The DoN ran additional tests at the same well over a 84-day period from December 1996 to March 1997. Another 200 pounds of TCE was removed. Test results indicate that there was no real "rebound" effect when the system was shutdown. *(The "rebound" effect is defined as increases in VOC concentrations that is sometimes observed when the SVE system is shutdown, depending upon site-specific characteristics.)* TCE concentrations in the soil dropped off and never rebounded to original values. A series of tests were performed at well 24SVE-10 for 164 days between June 1996 and November 1998 and 435 pounds of TCE were removed through 1997. Over time, concentrations at this well dropped off and never rebounded to the original values.

Pilot test results showed that SVE would be the most effective method for soil remediation at Site 24. SVE remediation was proposed for soil cleanup for Site 24. This was documented in the MCAS El Toro Proposed Plan dated May 1997. The Interim Record of Decision (ROD), signed in September 1997, selected SVE as the remedy for Site 24. After the ROD was signed, the remedial design phase began.

Mr. DeMars stated that the remedial action objectives are: to reduce the VOC concentrations in the source area to prevent further contamination of groundwater; and reduce average VOC soil gas concentrations below threshold values.

Work in Progress

Mr. DeMars said that MCAS El Toro is using the same SVE equipment that was used at Norton Air Force Base (AFB). The system was disassembled at Norton and trucked down to MCAS El Toro and assembled in November/December 1998. The DoN is utilizing the same contractor, Earth Tech, who managed the successful remediation at Norton AFB. Earth Tech will run the SVE equipment and manage the remediation and support construction and other support activities are being provided by IT/OHM. Remedial action at Site 24 is officially set to begin on March 30, 1999. Between now and March 30, 1999, more wells will be hooked up to the SVE system in order to continue testing the system. Once remedial action begins the RAB and other groups will be provided with periodic updates. After 6 months of SVE remedial action at Site 24, Earth Tech will conduct a 6-month comprehensive review to evaluate the performance of the system. Mr. DeMars said that by remediating the source of the VOC, the DoN expects to see an immediate effect in the quality of the groundwater.

Questions and Answers

A RAB member asked for an explanation as to why there was no rebound of TCE concentrations in the soil after the pilot tests were performed. Mr. DeMars said that DoN believes there was no rebound effect because the pilot tests may have made a significant dent in the overall soil contamination at the site. It was pointed out the data presented was very representative of what has occurred at other Navy sites where SVE has been used. To help clarify, this the rebound effect was further discussed. The SVE system removes a mass of VOCs then the system is shut off and the "rebound" occurs. This happens on a consistent basis until the residual VOCs remain. Residual VOCs absorb fairly well to the soil particles so there is "diffusion" from liquid to the vapor phase and this takes time. Thus, SVE systems reach a point where they get all the mass that comes out easily, then the residual is left is at low concentrations. As the system runs, the VOCs that are the easiest to remove come out first. The contaminants that are bound up in the soil tend to remain behind. SVE is a very effective system and it is not unusual to get one or two orders of magnitude of drop-off in the concentrations.

Mr. Joyce reminded the group that the DoN is providing the RAB with preliminary information collected of the pilot tests that were performed at Site 24. The DoN is not presenting this information and saying remediation of the site is complete. The SVE system will be operated until the Interim Remedial Action is considered successful. It was also pointed out that groundwater remediation will be a subsequent remedial action and that this action is still in the process of being proposed. Groundwater remedial action is tied to construction of the Irvine Desalter Project and negotiations are underway between the DoN and the Orange County Water District.

◆ Regulatory Agency Proposed Landfill Investigation, Sites 3 and 5 – Glenn Kistner and Tayseer Mahmoud

Mr. Kistner reminded the RAB that in December 1998, U.S. EPA sent a letter to the DoN strongly urging consideration for conducting a waste characterization study of the Site 3 and 5 landfills. The objective would be to conclusively determine if irrigation could be applied to the monolithic (single-layer) soil cap proposed for the landfills without causing any adverse environmental or human health impacts.

During January 1999, the regulatory agencies (U.S. EPA, DTSC, RWQCB and California Integrated Waste Management Board [IWMB]) developed a study that was forwarded to the Navy. The proposed study calls for performing waste characterization at the Site 3 and 5 landfills to determine if the organic content present could cause generation of methane gas that potentially could cause differential settlement once the new landfill cap is in place. Mr. Kistner said such a study would be more of a visual characterization and some measurements for moisture content and methane gas measurements would be taken. Also, limited hazardous waste characterization tests, such as a leaching test, could be conducted if the visual observations indicate, a soil or waste sample collected is discolored when compared to other samples collected. He emphasized that the intention is not to conduct an open-ended investigation. The investigation is to be strictly a limited investigation consisting mainly of

trenching of the two landfills supplemented by boreholes and is conducted in a phased approach. The regulatory agencies would oversee the field work. This investigation has been discussed with the Navy, and the regulatory agencies are waiting for a response from the DoN.

RAB members questioned why the regulatory agencies have confidence that this investigation would be necessary? Mr. Kistner said that there is a lot of anecdotal evidence that there is not much organic matter in the landfill that could cause methane gas differential settlement problems, but no one really knows until they go in and investigate what is in the landfills.

Mr. Peter Janicki, representing the IWMB, stated that, at this time, there is not enough conclusive supporting information for the state regulatory agencies to approve the proposed landfill cover (monolithic or single-layer soil cap with irrigation). He clarified that any gas analysis conducted would focus on methane. If methane is detected, traces of other gases may tag along with the methane. Other gases cannot move by themselves, they need to have a carrier, which is methane. If there is no methane, then they cannot fully detect other gases.

Mr. Mahmoud has consulted with DTSC technical staff members and asked them what kind of investigation they need to show that there is no public health threat. Technical staff at DTSC said there is no way to 100 percent verify that there is no threat unless they "swiss cheese the whole landfill." The other concern is the leaching of landfill wastes to groundwater. The proposed landfill cap alternative includes irrigation and DTSC feels that it is not adequate. A system that can monitor leachate 5 to 10 feet below the waste is needed. Also, if leachate is detected the sampling frequency would have to be increased. Unless the remedy or the amount of irrigation is changed, DTSC is asking that the DoN sample for hazardous waste in the agency-proposed landfill study.

In response to some questions regarding the agency-proposed study, Mr. Janicki said that the agencies would have a geologist on-site that would keep a log of the trenching results. Mr. Kistner stated that flexibility is important because they cannot foresee every circumstance that might arise. Obvious discoloration of soil would be a candidate for taking samples. If the DoN does not feel it is necessary to take a sample, perhaps one of the regulatory agencies could take a sample. He said that regulatory agencies would be looking for a submittal of a sampling plan for agency review. The Local Reuse Authority (LRA) would also be involved in the process. Sampling would then begin after sampling plan approval. Mr. Kistner said that the regulatory agencies feel that the sampling would take approximately 3 to 5 days for Site 3 and 2 to 3 days for Site 5, and cost approximately \$100,000.

Mr. Joyce reminded the RAB that this project is one that the regulatory agencies have only recommended the DoN to consider. He reiterated that the Marine Corps is committed to implementing remedies which are protective, and to the maximum extent practical, support reuse. There have been on-going discussions with the LRA regarding the remedy selection process for the landfills, specifically Sites 3 and 5 which are on the property that MCAS El Toro will be transferring to the Orange County Redevelopment Authority. Mr. Joyce also stated the recommendation is being coordinated with the DoN.

A RAB member asked when they will get into the cost benefit ratio between doing the sampling work, putting on a four-foot cap, making sure there isn't leaching into the groundwater or removing the waste itself. Mr. Kistner stated that for Site 3 removing the contents of the landfill is unlikely because Site 3 is 11 to 12 acres in size. He said that it could happen at Site 5 which has approximately 30,000 cubic yards of waste, but the primary objective is not to investigate removal options, but to determine what is in the landfills and also to determine if they can be irrigated. During the course of the investigation, if it looks like it is very innocuous material, maybe it would benefit the DoN to do some calculations to see whether it might be more cost effective to dig every thing out.

Mr. Joyce clarified that the remedy proposed to the public during the public comment period for Sites 3 and 5 was considered protective under a non-irrigated scenario. Future plans to irrigate the sites triggered modeling to see how much irrigation would be allowed and continue to be protective of public health and the environment. The IWMB now has concerns about the possible generation of methane gas at a site that has been closed for 40 years.

A RAB member asked if the results of moisture and chemical testing on samples obtained would change the remedy of the cap? Mr. Kistner replied that depends upon the results. If tests indicate that the amount of water applied to the cap has very little or no impact on the groundwater, or if it shows that up to a certain point, it would have an impact, then there might be some limitation on the amount of irrigation. If tests show irrigation would have a bad effect, there would be no irrigation. The cap might need to have a liner to further prevent any type of water from leaching through. Also, in the wastewater irrigation study the primary goal is to find out if wastes are primarily burned ash or whether it is organic waste. If it is incinerated waste in the landfill, then by definition it is going to be less likely to have organic leachate.

Mr. Kistner told the RAB to keep in mind that regardless of what remedy is put in place, downgradient groundwater monitoring would be conducted. If one of the sites were excavated, there would be no need for such monitoring at that site. If some waste were left in place, there would be a need for downgradient groundwater monitoring that would indicate if there were any problems.

Mr. Janicki said that the trenching would go down only to the bottom of the waste or as far down as technically feasible using the available equipment. The agency-proposed plan is to go down to the bottom of the waste only if it is feasible. Mr. Kistner stated that in some areas it might be more appropriate to put in boreholes rather than trenching.

A RAB member asked what the relationship is between the agency-proposed investigative study and transfer of land to the LRA? Mr. Joyce stated that the DoN cannot transfer the property until the remedy is in place and it is demonstrated to operate successfully. He also said the current plan is to construct the remedy in the year 2000.

A RAB member asked if there are questions regarding the model that the DoN used for estimating percolation rates from irrigation on the proposed monolithic soil cap. And, what has been the history of the state in terms of old landfills similar to these?

Mr. Mahmoud stated that the model shows between 5 to 13.8 inches of water infiltrating every year through the cap to the waste. The DTSC sent a letter to the DoN stating only non-irrigation is acceptable, unless the DoN further investigates the landfill. Mr. Janicki said that the landfill sites are unique. There is no data on the specific waste types and quantities disposed of in the sites or the condition of the wastes at this point in time. Mr. Kistner reiterated that the proposed work was a suggestion on U.S. EPA's part, strongly urging an investigation be conducted, and the Navy has taken this under advisement. Mr. Janicki pointed out that proposed study discussed was not the only option proposed to the DoN. Alternative 4D (single-layer soil cap with synthetic flexible membrane liner) was supported by the DTSC and IWMB.

Dr. Chuck Bennett, RAB Subcommittee Co-Chair said the investigation sounds like a very good idea and hopes that the DoN is responsive to the regulatory agencies' recommendation. He also suggested that this topic be discussed at one of the upcoming subcommittee meetings in greater detail.

In response to a RAB member request for a contact person regarding the agency-proposed study, Mr. Joyce recommended that the RAB send letters to him as RAB Co-chair and he will forward them to the appropriate people in Washington, D.C. Mr. Hurley told the RAB that he has a list of people who can effectively influence the process. He agreed that the agency-proposed study could be discussed at a RAB subcommittee meeting.

Mr. Joyce said that he is in the process of coordinating the status of the request for the agency-proposed study, and as of the last RAB meeting, there was an uncertainty as to what the regulatory agencies actually proposed. Recently, it is becoming clear as to what the regulatory agencies are proposing.

A RAB member made a motion for the RAB to support the U.S. EPA's proposal for further investigations at Site 3 and Site 5. The motion was seconded and approved by the RAB's community members.

◆ Status of DTSC "One Voice" - Tayseer Mahmoud

Mr. Joyce told the RAB that Mr. Mahmoud was not present at the last RAB meeting. Marsha Mingay, Public Participation Specialist, represented DTSC in his absence. She took an action back DTSC to offer clarification to the RAB on the status of the DTSC one voice concept for all the State regulatory agencies that have interest in the environmental cleanup program. Mr. Mahmoud is to give an update on how the one voice concept is implemented for the State of California.

Mr. Mahmoud said that DTSC wanted to be the one voice and served in that capacity until October 1997 when there was a budget cut. At that time DTSC had to split the work between DTSC and RWQCB. DTSC could no longer solely review documents. Because of the budget cut, DTSC asked the Navy to assist with coordination and send the documents directly to the IWMB who has jurisdiction on landfill issues or to other regulatory agencies who have jurisdiction on other issues in order to expedite the review time and to save money on

postage. Coordination assistance would save resources for document review. He said DTSC and other involved state agencies would continue to provide quality review of documents.

Mr. Hurley mentioned that there is a Defense Environmental Reuse Task Force (DERTF) meeting next week in San Francisco to discuss funding. DERTF is a Congressional appointed panel made up of a variety of people from different disciplines that oversee the entire BRAC reuse process for the United States. They report directly back to Congress. The meeting is taking place February 2-3, 1999 and is open to the public. There will be at least one public comment period where RAB members and other interested individuals can express their concerns and ideas.

Mr. Hurley said that two years ago a group of citizens active in environmental reuse for military bases started a national RAB caucus. That meeting usually takes place before or after the DERTF meeting. Mr. Hurley said that he has names of the people hosting the RAB caucus if anyone is interested. Mr. Hurley stated that the DERTF meeting schedule is on the DERTF web site.

◆ Presentation of a Signed CERCLA Record of Decision – Joseph Joyce, MCAS El Toro BRAC Environmental Coordinator and RAB Co-Chair

Mr. Joyce provided a handout from U.S. EPA on developing Superfund Records of Decisions (RODs). He said that the DoN follows the guidelines in the document when developing a ROD. The brief overview presentation is of the ROD for Site 24, the VOC Source Area that selected SVE for soil remediation. The ROD was signed by Federal Facility Agreement signatories in September 1997. He walked RAB members through Table of Contents of the ROD to briefly summarize the key points of the different sections. Mr. Joyce also provided the RAB with a copy of the ROD Table of Contents. He also brought two copies of the signed Draft Final ROD to the meeting for RAB members that were passed around during his presentation. Mr. Joyce reminded the RAB that the MCAS El Toro Information Repository and the on-Station at the Administrative Record file both have a copy of the document. Below is a brief section-by-section outline of the document:

- 1 – Site Location and Description
- 2 – Site History: when the base was commissioned, past operations, Federal Facilities Agreement, BRAC cleanup team
- 3 – Highlights the Community's Participation in the Process: RAB and their role; information repository; Administrative Record file; proposed plans; mailing list; and newspaper/public notices
- 4 – Scope and Role of the Operable Unit
- 5 – Summary of Site Characterization and Source of Contamination
- 6 – Summary of Site Risks – risk assessment in the remedial investigation
- 7 – Description of Alternatives: no action and remedy
- 8 – Summary of Comparative Analysis of Alternatives
- 9 – Selected Remedy
- 10 – Statutory Determination – ARARs, regulatory requirements
- 11 – Documentation of Significant Changes

12 – References

Attachment – Response to Comments on the Proposed Plan

In regard to comments submitted during the public comment period, Mr. Joyce said that copies of comments with responses are not sent back to each public member that provided comments. If an individual submits comments, they are documented in the Responsiveness Summary in the ROD. It was pointed out that when the Responsiveness Summary was completed for the last two signed RODs, Marsha Mingay, DTSC, sent out the responses to those people who had submitted written comments. It was an extra service provided by the DTSC. The DoN and the regulatory agencies are not obligated by law to do so.

◆ Update on Perchlorate Sampling Results– Andy Piszkin, Lead Remedial Project Manager, Southwest Division Naval Facilities Engineering Command

Mr. Piszkin's provided a handout and information detailing the results from the groundwater sampling effort that focused on perchlorate. He walked RAB members through the 7-page table of laboratory analysis results and explained column-by-column how to read and comprehend the data. Over 50 locations at MCAS El Toro were sampled during this effort. The sampling and analysis for perchlorate involved split samples and a double-blind performance evaluation. These samples were spiked with a certain unknown concentration of dummy identifiers and provided to sampling technicians in the field. Testing of these samples by the laboratories serves as a check on the quality control of the laboratories involved in the analysis of all samples.

Mr. Piszkin said that both U.S. EPA and DTSC analyzed split (replicate) samples. There was only one detection in the entire study that exceeded DTSC's current provisional state action level of 18 parts per billion (ppb). The U.S. EPA is considering an action level of 32 ppb. The one sample that exceeded these action levels was obtained from the center of Site 1, Explosive Ordnance Disposal Range. Site 1 is an active training facility that also serves as a disposal site where the law enforcement agencies detonate explosive devices found in the community.

He said that based on the sampling results, the basic conclusion is that sampling for perchlorate would not be necessary except for at Site 1. Mr. Piszkin said that the DoN concurs with the regulatory agencies that monitoring for perchlorate at and downgradient of Site 1 should continue as part of the long-term groundwater monitoring at the Station. Mr. Joyce said that final development of the long-term groundwater monitoring plan has been postponed until the perchlorate results are evaluated and considered.

Mr. Joyce added that discussions are underway regarding possible transfer of Site 1 from the DoN to another federal agency, the FBI. If the site were transferred to the FBI or another agency that would use it for the same type of operations, the site would not be remediated. When conclusions are reached on the transfer the RAB will be briefed.

◆ **Open Question and Answer (Environmental Topics) – Joseph Joyce**

Q: What is the rationale for 18 ppb action level for perchlorate?

A: (provided by Glenn Kistner, U.S. EPA) - Studies performed on animals served as the basis for the provisional action level. He said that U.S. EPA is working on a fast-track effort on proposing an action level and that the proposed 32 ppb is undergoing review. After review the number could be 32 or 18 or 11 ppb. U.S. EPA is hoping to determine the action level sometime in March 1999.

Q: How does perchlorate sampling look for Orange County Water District (OCWD) wells?

A: (provided by Andy Piszkin, SWDIV) – A year ago an OCWD well was tested and the detection was 7.6 and the Navy's sample this year was detected at 10 ppb. Mr. Roy Herndon added that with this limited sampling for perchlorate, could it be determined if this is enough data to make a decision or is more sampling needed? Mr. Joyce reiterated that that final development of the long-term groundwater monitoring plan has been postponed until the perchlorate results are evaluated and considered.

Q: What are the other sources of perchlorate?

A: (provided by Andy Piszkin, SWDIV) – It was pointed out that at the December 2, 1998 RAB meeting, another potential source of perchlorate is from fertilizers and there has been a lot of agriculture in the vicinity of the Station.

Dr. Chuck Bennett, read a short statement regarding the Draft Feasibility Study for OU-2A Site 24, March 1997, based upon additions made on December 5, 1997 in regard to groundwater remediation. The statement is summarized below.

Dr. Bennett said that there are essentially two groundwater alternatives for Site 24 groundwater remediation, both beginning with pump and treat. In case A, water is directed to the planned Irvine Desalter Project, in Case B product water is to be reinjected. He said Case A shows no long-term problem, but Case B is inadequate, ill advised, and still costly. Reinjection is risky, can exacerbate pollution unless there is a clear understanding of the underlying soil stratigraphy. He added that he believes the Navy's alternatives to the Desalter are too limited and are not adequately protective of human health and the environment. This statement would be included with all public information materials (handouts) from this RAB meeting, which are included in the Administrative Record file and the Information Repository.

MEETING EVALUATION AND FUTURE TOPICS

During the meeting evaluation RAB members provided the following comments:

- Good meeting, condensed, pertinent topics, kept to the schedule;
- Appreciated the Department of the Navy's candor.

Suggestions for future presentation topics include:

- Irvine Desalter Project – Implications of groundwater remediation alternatives if the Desalter Project does not proceed;
- Responsibility and oversight of the MCAS El Toro after the July 1999 operational closure;
- Update on Sites 2 and 17 – Coordination with the U.S. Fish and Wildlife Service;
- MCAS El Toro RAB - How long will the RAB be active?;
- Update on OU-3 Site 12;
- Update on the remedy for the Station landfills;
- Mingling of MTBE groundwater plumes from MCAS El Toro with plumes from area gas stations;
- Update on the February DRTF meeting.

CLOSING ANNOUNCEMENTS/FUTURE MEETING DATES

- The next RAB meeting is scheduled for 6:30 to 9:00 p.m., Wednesday, March 31, 1999 at the Irvine City Hall, Conference and Training Center, One Civic Center Plaza, Irvine.
- The next RAB subcommittee meeting is scheduled for 6:30 to 9:00 p.m., Wednesday, April 28, 1999 at the Irvine City Hall, Conference and Training Center, One Civic Center Plaza.

The 37th meeting of the MCAS El Toro Restoration Advisory Board was adjourned at 9:00 p.m.

Attachments:

- Sign-in sheets.

Handouts provided at the meeting and available at the Information Repository:

- RAB Meeting Agenda/Public Notice –1/27/99 RAB meeting.
- RAB Meeting Minutes – 12/2/98 RAB meeting and Attachment (*Minutes approved at the 12/2/98 meeting; attachment with comments is included*).
- Navy and Marine Corps – Internet Access, Environmental Web Sites.
- DoD - Environmental Base Realignment and Closure Web Site Publications List.
- MCAS El Toro Installation Restoration Program Mailing List Coupon.
- MCAS El Toro – Meeting Schedule, Full RAB and RAB Subcommittee, January-August 1999.
- MCAS El Toro Restoration Advisory Board – Installation Restoration Program Site Tour – VOC Source Area (announcement, sign-up form, directions).
- For More Information on MCAS El Toro Redevelopment, contact Ms. Courtney Wiercoch, Development Program Manager, El Toro Master Development Program (714) 834-3000.
- Local Redevelopment Authority Schedule (dated January 27, 1999) with County of Orange Executive Office and Clerk of the Board Due Dates for 1999 Agenda Items (attachment).
- *Presentation* - Remediation of the Volatile Organic Compound Source Area, Installation Restoration Program, Site 24, MCAS El Toro, Dave DeMars, Remedial Project Manager (RPM), Southwest Division Naval Facilities Engineering Command (SWDIV).
- Fact Sheet – Update on Environmental Restoration Program at MCAS El Toro, January 1999 – Marine Corps to Proceed with Interim Remedial Action at Site 24.
- Map – TCE Vapor Concentrations in the Deep Vadose Zone as of December 1998, Vadose Zone Remediation – IRP Site 24.

- Graph and Location Map – Soil Gas Data (1995) with Selected Influent TCE Concentrations at Well 24SVE1, MCAS El Toro.
- Graph and Location Map – Selected Influent TCE Concentrations at Well 24SVE10, MCAS El Toro.
- Assembly of Central SVE Treatment System at Site 24 VOC Source Area, MCAS El Toro (includes photos, map, and diagram).
- U.S. EPA Quick Reference Fact Sheet – A Guide to Developing Superfund Records of Decision, May 1990.
- Provided by Chuck Bennett, RAB Member – Preliminary Questions Regarding: Draft Phase II Feasibility Study Report, OU 2A – Site 24, March 1997 (Updated 28 January 1999); provided for inclusion with 1/27/98 RAB Meeting Materials and Handouts.

Agency Comments - U.S. Environmental Protection Agency (U.S. EPA)

- U.S. EPA Comments on Draft Proposed Plan for Groundwater Remediation at MCAS El Toro (letter dated January 13, 1999).
- U.S. EPA Comments on Planning Documents for the OU-#3B Phase II Remedial Investigation/Feasibility Study at MCAS El Toro, December 1998 (letter dated January 14, 1999).
- U.S. EPA Review of Draft Technical Memorandum – Evaluation of Metals Concentrations in Groundwater (memo dated January 15, 1999).
- U.S. EPA Approval of Draft Final Engineering Design Report (EDR) Vadose Zone Remediation site 24, MCAS El Toro, December 1998 (letter dated January 20, 1999).
- U.S. EPA Request for Extensions to the Federal Facilities Agreement (FFA) Schedules, Operable Unit (OU)-3, Sites 8, 11, and 12, MCAS El Toro (letter dated December 3, 1998).

Agency Comments – California Environmental Protection Agency (Cal-EPA)

- Cal-EPA Request for Extensions to the Federal Facilities Agreement (FFA) Schedules, Operable Unit (OU)-3 Sites 8, 11, and 12 MCAS El Toro (letter dated December 3, 1998).
- Cal-EPA Department of Toxic Substances Control (DTSC), Closure Report Approval – Solid Waste Management Unit 244 at MCAS El Toro (letter dated December 17, 1998).
- Cal-EPA DTSC, Federal Facilities Agreement (FFA) Schedule, MCAS El Toro (letter dated December 22 1998).
- Cal-EPA Department of Toxic Substances Control (DTSC), Approval of Draft Final Engineering Design Report (EDR), Operating and Maintenance Manual (O&MM), Construction Quality Assurance/Quality Control (QA/QC) Plan, and Contingency Plan (CP) for Vadose Zone Remediation at Operable Unit 2A, Site 24, MCAS El Toro (letter dated January 13, 1999).
- Cal-EPA DTSC, Comments on Draft Proposed Plan for Groundwater Remediation, Operable Unit (OU) 2A Site 24 and OU-1 Site 18, MCAS El Toro (letter dated January 22, 1999).
- Cal-EPA DTSC, Comments on MCAS El Toro's Restoration Advisory Board Meeting Minutes for December 2, 1998 (memo dated January 26, 1999).

Copies of all past RAB meeting minutes and handouts are available at the MCAS El Toro Information Repository, located at the Heritage Park Regional Library in Irvine. The address is 14361 Yale Avenue, Irvine; the phone number is (949) 551-7151. Library hours are Monday through Thursday, 10 am to 9 p.m.; Friday and Saturday, 10 am to 5 p.m.; Sunday 12 p.m. to 5 p.m..

Navy and Marine Corps Internet Access - Environmental Web Sites (includes RAB meeting minutes)

<http://www.efdswest.navy.mil/pages/Envrnm1.htm>

Department of Defense - Environmental BRAC Web Page

www.dtic.mil/environdod/envbrac.html

U.S. EPA Superfund Web Page

www.epa.gov/superfund/index.html

**MCAS EL TORO
RESTORATION ADVISORY BOARD MEETING
January 27, 1999**

RAB MEMBER SIGN-IN SHEET

Name	Signature	Name	Signature
Barney, Col. Joseph P. (ret)		Kistner, Glenn	PRESENT - DID NOT SIGN IN
Bennett, Dr. Charles	<i>Charles Bennett</i>	Koepke, Jeffrey	<i>Jeffrey Koepke</i>
Brady Jr., Paul		Mahmoud, Tayseer	<i>Tayseer Mahmoud</i>
Britton, George		Matheis, Mary Aileen	
Chenarides, Arline		Mathews, Thomas	<i>Thomas Mathews</i>
Chenarides, Harry		McVicker, Robert R.	
Cohn, Enid	<i>Enid Cohn</i>	Meier, Fred J.	
Crompton, Chris		Murphy, Don	<i>Don Murphy</i>
Farber, Joseph	<i>Joseph Farber</i>	Olquin, A. Richard	
Gallagher, George M.		Reavis, Gail	
Hannon, Patricia	<i>Patricia Hannon</i>	Rudolph, Marcia	<i>Marcia Rudolph</i>
Herndon, Roy	<i>Roy Herndon</i>	Sharp, Steven	<i>Steven Sharp</i>
Hurley, Greg - Co-Chair	<i>Greg Hurley</i>	Werner, Jerry	<i>Jerry Werner</i>
Hersh, Peter		Woodings, Bob	
Joyce, Joseph - Co-Chair	<i>Joseph Joyce</i>	Zweifel, Donald E.	<i>Donald Zweifel</i>

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PORTIONS OF THIS RECORD ARE CONSIDERED
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THE NAMES, ADDRESSES AND PHONE NUMBERS OF
PRIVATE CITIZENS HAVE BEEN REDACTED IN
ACCORDANCE WITH THE PRIVACY ACT

QUESTIONS MAY BE DIRECTED TO:

**DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 923132**

TELEPHONE: (619) 532-3676

**MCAS(L TORO
RESTORATION ADVISORY BOARD MEETING
January 27, 1999**

**NON-RAB MEMBER SIGN-IN SHEET
Other Attendees, Guests**

NAME <u>PLEASE PRINT CLEARLY</u>	AFFILIATION	MAILING ADDRESS	PHONE FAX	INTERESTED IN RAB MEMBERSHIP?
Jamshid Sadeghipour	Foster Wheeler	611 Anton Blvd Suite 800 Costa Mesa, CA 92626	714-444-5519 fax 714-444-5560	
David Cheng	IT	5 Fasano Irvine CA 92620	949-660-7546	
Bill Sedlak	IT/Ohm	3347 M. Nelson Dr. St 200 Irvine CA 92612	949-660-5456	<u>NO</u>
Sue Lamoureux	David Evans Assoc.	23382 Mill Creek Dr # 225 Laguna Hills, Ca 92653	949 588-5050	
Scott KETHE	NAVY Force El Toro		(949) 726-2506	No
Jerry Kirchgesner	College Park HOA NIVA	3486 EBOE ST IRVINE 92606	949 552-3548	

**MCAS EL TORO
RESTORATION ADVISORY BOARD MEETING
January 27, 1999**

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**NON-RAB MEMBER SIGN-IN SHEET
Other Attendees, Guests**

NAME <u>PLEASE PRINT CLEARLY</u>	AFFILIATION	MAILING ADDRESS	PHONE FAX	INTERESTED IN RAB MEMBERSHIP?
Michael Pound	U.S. Navy		(619) 532-2546	
BOB HARTMAN	TYREE	22055 BROKEN BOW LAKE FOREST, CA 92630		
Polin Modantou	County of Orange	10 Civic Center Plaza 2nd floor Santa Ana, CA 92701		
ANDY PISZKIN	NAVY			
Virginia JAMES		/ /		

**MCAS | TORO
RESTORATION ADVISORY BOARD MEETING
January 27, 1999**

**NON-RAB MEMBER SIGN-IN SHEET
Other Attendees, Guests**

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NAME <u>PLEASE PRINT CLEARLY</u>	AFFILIATION	MAILING ADDRESS	PHONE FAX	INTERESTED IN RAB MEMBERSHIP?
DARIE TERAMI	BECHTEL	1230 SA COLUMBIA SD 57		No
Peter Janich	CIWMB	8800 Cal Ctr. Dr. Sacramento 95826	(916)255-1195	No
Marie Whaling	Orange Co. Committee of Correspondence	1917 Mimosa Place Fullerton		No
				No
CRISPIN WANYOKE	EARTH TECH	100 W. Broadway Long Beach CA 90801	562-951-2057	NO

**MCAS EL TORO
RESTORATION ADVISORY BOARD MEETING
January 27, 1999**

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**NON-RAB MEMBER SIGN-IN SHEET
Other Attendees, Guests**

NAME <u>PLEASE PRINT CLEARLY</u>	AFFILIATION	MAILING ADDRESS	PHONE FAX	INTERESTED IN RAB MEMBERSHIP?
Stephenie Chute	Harding Lawson Associates	20 Corporate Park Suite 400		no
Barbara Marr	P.O. Committee of Correspondence	P.O. Box 10026 Fullerton 92838		No
				No
			CONFIDENTIAL	

Navy and Marine Corps - Internet Access Environmental Web Sites

Southwest Division Naval Facilities Engineering Command Web Site:

<http://www.efdswest.navfac.navy.mil/DEP/ENV/default.htm>

Department of Defense - Environmental BRAC Web Page

www.dtic.mil/environdod/envbrac.html

U.S. EPA Superfund Web Page

www.epa.gov/superfund/index.html

www.dtic.mil/envirodod/brac/publish.html



Publications

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The following publications have been produced by the Office of the Assistant Deputy Under Secretary of Defense (Environmental Cleanup).

Some of these documents are in Adobe PDF format. In order to read these files you must Download Adobe Acrobat Reader, if it is not already installed on your computer. Once you have installed Adobe Acrobat Reader, click on the PDF document you wish to view. Then, select the ".exe" (executable) file in the Adobe Acrobat directory when your browser prompts you to select an application for viewing the document. (See page 2, backside.)

> Guidance Documents

- [BRAC Cleanup Plan Abstract and BCP Abstract Instructions](#)
- [BRAC Cleanup Plan \(BCP\) Guidebook \(Fall 95\)](#)
- [Retention of Environmental Professionals at Closing Installations](#)

> Policy Documents

- [Environmental Review Process to Obtain the Finding of Suitability Required for Use of Early Transfer Authority for Property Not on the National Priorities List \(April 1998\) **New!**](#)
- [DoD Finding of Suitability to Transfer for BRAC Property \(FOST\) Policy Memorandum \(June 1994\)](#)
- [Asbestos, Lead-based Paint \(LBP\) and Radon Policy Memorandum \(October 1994\)](#)
- [FAST Track Cleanup at Closing Installations \(May 1996\)](#)
- [Implementation of Authority to Transfer Property Before Completing Remediation \(September 1996\)](#)
- [DoD Future Land Use Policy \(July 1997\)](#)
- [Clarification of "Uncontaminated" Environmental Condition of Property at Base Realignment and Closure \(BRAC\) Installations \(October 1996\)](#)

> Factsheets, Guides, & Tools

- [Fact Sheet - Early Transfer Authority \(May 1998\) **New!** Adobe PDF Format](#)
- [Fact Sheet - CERCLA/RCRA Overlap in Environmental Cleanup \(May 1998\) **New!** Adobe PDF Format](#)
- [A Guide to Establishing Institutional Controls at Closing Military Installation , \(February 1998\) **New!**](#)
- [A Guide to Assessing Reuse and Remedy Alternatives at Closing Military Installations \(February 1996\)](#)
- [BRAC 1995 Quick Reference: Community and Environment \(1995\)](#)
- [BRAC Fast -Track Cleanup Environmental Guide](#)
- [Expediting BRAC Cleanups Using CERCLA Removal Authority Fact Sheet \(Spring 1997\)](#)
- [Fact Sheet - Field Guide to FOSTL](#)
- [Fast Track to FOST A Guide to Determining if Property is Environmentally Suitable for](#)

Transfer (Fall 1996)

- [Innovative Solutions Save Time and Money Fact Sheet](#) (Spring 1997)
- [Institutional Controls - What They Are and How They Are Used Fact Sheet](#) (Spring 1997)
- [Keys to Opening the Door to BRAC Cleanup Team \(BCT\) Success](#)
- [Overview of the Fast-Track Cleanup Program Fact Sheet](#) (Spring 1997)
- [Map of Fast-Track Cleanup Installations Under BRAC](#)
- [United Efforts Strengthen Cleanups - Partnering Makes a Difference](#) (Spring 1997)
- [Updating your RAB to Meet BRAC Needs](#) (June 1996)
- [Using CERCLA ARAR Waivers in BRAC Cleanups](#) (Fall 1997)

▶ Reports

- [Fast-Track Cleanup: Successes and Challenges, 1993-1995](#)

▶ Presentations

- No presentations are currently available.

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MCAS El Toro
Installation Restoration Program

MAILING LIST COUPON

If you would like to be on the mailing list to receive information about environmental restoration activities at MCAS El Toro, please complete the coupon below and mail to: Commanding General, AC/S, Environment, (1AU), Attn: Mr. Joseph Joyce, IRP Department, MCAS El Toro, P.O. Box 95001, Santa Ana, CA 92709-5001.

- Add me to the MCAS El Toro Installation Restoration Program mailing list.
- Send me information on Restoration Advisory Board membership.

Name _____

Street _____

City _____ State _____ Zip Code _____

Affiliation (optional) _____ Telephone _____

MCAS El Toro -- Meeting Schedule

Full RAB and RAB Subcommittee

January – August 1999

The Conference and Training Center (CTC) at Irvine City Hall has been reserved/confirmed for RAB meetings (full RAB) on the last Wednesday of the month (CTC reserved). Dates listed in *italic* are for RAB Subcommittee meetings.

RAB Meetings

- **January 27, 1999 (CTC reserved)**
- **April 21, 1999 (CTC reserved)**
[rescheduled from 3/31/99]
- **May 26, 1999 (CTC reserved)**
- **July 28, 1999 (CTC reserved)**

Subcommittee Meetings

- *February 24, 1999 (CTC Reserved)*
- *April 28, 1999 (CTC Reserved)*
- *June 30, 1999 (CTC Reserved)*
- *August 25, 1999 (CTC Reserved)*



ACQUISITION AND
TECHNOLOGY

OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

DEC. 22 1998

Mr. Gregory F. Hurley
Co-Chair, E1 Toro Restoration Advisory Board
C/O Kutak Rock, Suite 450
620 Newport Center Drive
Newport Beach, California 92660

Dear Mr. Hurley:

Thank you for your recent letter concerning the level of funding provided to the State of California by the Department of the Navy through the Defense and State Memorandum of Agreement (DSMOA) for regulatory oversight of Navy environmental cleanup activities. Let me assure you that both the Department of the Navy and the Office of the Secretary of Defense (OSD) are committed to ensuring reimbursement to states for regulatory oversight under the Defense Environmental Restoration Program.

In Fiscal Year 1997, OSD devolved funding for DoD's cleanup program to the Military Departments. With OSD oversight, the Military Departments now make their own budgeting and funding decisions. Since devolvement, they have paid special attention to controlling growing overhead costs in an attempt to preserve as much funding as possible for actual cleanup activities. The Army, Navy, and Air Force, as well as several states, have been concerned about the relatively high cost of oversight in California. A couple of years ago, the Navy conducted a detailed analysis of the cost of state regulatory oversight programs. California oversight costs were found to be, by far, the most costly per installation and per cleanup dollar spent. In one case study, Marine Corps Air Station E1 Toro was compared to a Marine Corps base on the East Coast with a similar number of sites and similar site characteristics. At that time, both bases had spent about the same amount of cleanup funds. California, however, had spent ten times the amount of DSMOA oversight funds, yet cleanup progress lagged considerably behind the East Coast base.

The Navy and California's Department of Toxics and Substance Control (DTSC) have been working closely in an attempt to reduce oversight costs while maintaining DTSC's primary mission--to ensure that remedy selections are protective of human health and the environment. The Navy and DTSC have just completed a detailed "bottom-up" review of the work to be included in the next two-year cooperative agreement under the DSMOA. One issue yet to be resolved is the Navy's assertion that DTSC staff are taking actions beyond those prescribed to

Environmental Security



Defending Our Future

DTSC to ensure a protective remedy. We believe that close cooperation among the Restoration Advisory Board, the Base Realignment and Closure (BRAC) Cleanup Team, and the Local Redevelopment Authority is the best way to ensure a remedy that complements, to the extent practicable, the reuse plan.

In conclusion, we are confident that continued dialogue between the Navy and DTSC will ensure that sufficient funds are provided through the DSMOA cooperative agreement to accomplish DTSC's primary mission.

Thank you for your interest in E1 Toro and for your dedicated work on the Restoration Advisory Board.

Very truly yours,

A handwritten signature in black ink, appearing to read "S. Goodman", with a long horizontal flourish extending to the right.

Sherri W. Goodman
Deputy Under Secretary of Defense
(Environmental Security)

MARINE CORPS AIR STATION EL TORO
Installation Restoration Program
Restoration Advisory Board Mission Statement and Operating Procedures

This "Marine Corps Air Station (MCAS) El Toro, Installation Restoration Program, Restoration Advisory Board (RAB), Mission Statement and Operating Procedures", replaces the original document dated February 28, 1995, (reference pg. five (5), Section IV., b. of this document). Modifications were made and approved by a majority vote of the RAB members present at the RAB meeting of January 31, 1996, at Irvine City Hall. The RAB's recommended amendments are incorporated into this new, revised version of the "Mission Statement and Operating Procedures".

The Restoration Advisory Board (RAB) mission statement and operating procedures, herein referred to as "the mission statement and operating procedures", is entered into by the following parties; U. S. Marine Corps (USMC); U. S. Environmental Protection Agency (USEPA), Region 9; California Department of Toxic Substances Control (DTSC), Region 4; and the RAB. Marine Corps Air Station (MCAS) El Toro has developed a Community Relations Plan (CRP) which outlines the community involvement program. The RAB supplements the community involvement effort. A copy of the CRP is available at the information repository located at the Heritage Park Regional Library, 14361 Yale Avenue, Irvine, CA 92714.

I. Mission Statement of the RAB

a. The mission of the RAB is to promote community awareness and obtain timely constructive community review and comment on proposed environmental restoration actions to accelerate the cleanup and property transfer of MCAS El Toro. The RAB serves as a forum for the presentation of comments and recommendations to USMC, Remedial Project Managers (RPMs) of USEPA, and DTSC.

II. Basis and Authority for this Mission Statement and Operating Procedures

a. This mission statement and these operating procedures are consistent with the Department of Defense (DoD), USEPA Restoration Advisory Board Implementation Guidelines of September 27, 1994, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendment and Reauthorization Act (SARA) of 1986, particularly Sections 120 (a), 120 (f), 121 (f), and 10 U.S.C. 2705, enacted by Section 211 of SARA, and September 9, 1993, DoD policy letter entitled, "Fast Track Cleanup at Closing Installations".

III. Operating Procedures

A. Membership

1. All RAB members must reside in or serve communities within Orange County.
2. Members shall serve without compensation. All expenses incidental to travel and review inputs shall be borne by the respective members or their organization.

3. If a member fails to attend two consecutive meetings without contacting the RAB, or at least one of the RAB co-chairs, or fulfill member responsibilities including involvement in a subcommittee, the RAB co-chairs may ask the member to resign.

4. Members unable to continue to fully participate shall submit their resignation in writing to either of the RAB co-chairs.

5. Total membership in the RAB shall not exceed 50 members.

6. Application for RAB membership vacancies shall take place as such vacancies occur. Applications will be reviewed and approved by the Base Realignment and Closure (BRAC), Environmental Coordinator (BEC), USEPA, and DTSC along with consultation with the RAB community co-chair. Candidates will be notified of their selection in a timely manner.

7. Each RAB community member is considered equal, whatever their position in the community, and has equal rights and responsibilities.

RAB Membership Responsibilities

a. Actively participate in a subcommittee and review, evaluate, and comment on technical documents and other material related to installation cleanup, all assigned tasks are to be completed within the designated deadline date.

b. Attend all RAB meetings.

c. Report to organized groups to which they may belong or represent, and to serve as a mediator for information to and from the community.

d. Serve in a voluntary capacity.

B. RAB Structure

1. The RAB shall be co-chaired by the MCAS El Toro BEC, and a community co-chair member. The BEC shall preside over the orderly administration of membership business.

2. A community co-chair will be selected by a majority vote of the RAB community members in attendance. Elected officials and government agency staff members of any legally constituted MCAS El Toro reuse groups are excluded from holding the community co-chair position. The community co-chair will be selected annually on the anniversary of the effective date of the agreement.

Community Co-Chair Responsibilities

a. Assure that community issues and concerns related to the environmental restoration/cleanup program are brought to the table.

b. Assist the USMC in assuring that technical information is communicated in understandable terms.

c. Coordinate with the BEC to prepare and distribute an agenda prior to each RAB meeting, and for the review and distribution of meeting minutes.

d. Assist subcommittees in coordinating and establishing meeting times/locations.

e. The community co-chair may be replaced by a majority vote of the RAB community members present at the meeting in which a vote is undertaken.

3. The RAB shall meet quarterly. More frequent meetings may be held if deemed necessary by the RAB co-chairs. The BEC will facilitate in the arrangement of the meetings and notify members of the time and location.

4. Agenda items will be compiled by the RAB co-chairs. Suggested topics should be given to the BEC or community co-chair not later than two (2) weeks prior to the meeting. The BEC shall be responsible for providing written notification to all RAB members of the upcoming agenda and supporting documents, at least two (2) weeks prior to the date, time, and place of scheduled RAB meeting.

5. The BEC shall be responsible for recording and distribution of meeting minutes. Also, the BEC shall collect a written list of attendees at each meeting, which will be incorporated into the meeting minutes. For quarterly meetings, the minutes will be distributed 30 days prior to the following meeting. For more frequent meetings, the minutes will be distributed as soon as possible.

6. A copy of the RAB meeting minutes will be sent to all RAB members. Supporting documents will be available for public review in the information repository and other repositories as identified.

7. RAB members will be asked to review and comment on various environmental restoration documents. Written comments may be submitted individually by a member, or by the RAB as a whole. Written comments will be submitted to the community co-chair on the subject documents within the schedule as provided for regulatory agency comments. The community co-chair will consolidate comments from RAB members and provide all comments received to the BEC. The BEC will ensure that a written response is provided to the RAB in a timely manner.

Subcommittees

8. The RAB will develop subcommittees, which will provide a concentrated focus on assigned issues. Assignments will be based on the needs of the RAB.

a. Subcommittees will consist of standing subcommittees and ad hoc committees. Membership on subcommittees will be comprised of volunteers, or may be selected by the BEC and the community co-chair. Subcommittee membership will generally be limited to seven (7)

people, but may be supplemented at the discretion of the subcommittee chair. All subcommittees will set their own agendas and meeting times, will be open to the public, and will notify the BEC and community co-chair of the meeting times and places. Each subcommittee will elect a chair. The subcommittee membership may dismiss a subcommittee chair by a majority vote. Subcommittee chair removal is determined at the meeting where removal is addressed by majority vote of the RAB members present.

b. RAB members may serve on one or more subcommittees, but may not chair more than one subcommittee.

c. Standing subcommittees are established as follows:

- (1) BRAC Clean-up Plan (BCP)
- (2) General Environmental
- (3) Community Environmental Response Facilitation Act/Environmental Baseline Survey (CERFA/EBS)
- (4) Compliance/Resource Conservation and Recovery Act-Facility Assessment (Compliance/RFA)
- (5) Operable Unit One (OU1) - Groundwater
- (6) Operable Unit Two (OU2) - Landfills
- (7) Operable Unit Three (OU3) - All other sites

d. Membership on the BRAC Clean-up Subcommittee will include at a minimum, the BEC, the community co-chair, and the chairs of each of the other standing subcommittees.

e. Standing subcommittees will be reviewed annually, in September, to determine if their continued existence is required.

f. Ad hoc subcommittees will be established as needed and will be limited to one year.

g. Subcommittees may request the participation, involvement and advise of regulatory agency members.

9. MCAS El Toro has established an information repository for all public documents relating to restoration activities at MCAS El Toro. The repository is located at the Heritage Park Regional Library, 14361 Yale Avenue, Irvine, CA 92714. RAB members, as well as the general public, are authorized access to any documents, studies or information, which have been placed in the repository or distributed at RAB meetings. The community co-chair will be provided one copy of all draft documents. Each subcommittee will be provided up to seven copies of draft documents.

IV. Effective Date and Amendments

a. The effective date of this mission statement and operating procedures shall be the date that the last signatory signs this mission statement and operating procedures.

b. This mission statement and operating procedures may be amended by a majority vote of the RAB members present. Amendments must be consistent with the MCAS El Toro Federal Facility Agreement (FFA), and the statues stated in Part II of the mission statement and operating procedures, (Basis and Authority for this Mission Statement and Operating Procedures).

V. Terms and Conditions

a. The terms and conditions of this RAB mission statement and operating procedures, and DONs endorsement thereof, shall not be construed to create any legally enforceable rights, claims or remedies against DON or commitments or obligations on the part of DON, and shall be construed in a manner that is consistent with CERCLA, 10 U.S.C. Section 2705, and 40 CFR Part 300.

VI. Termination

a. This mission statement and operating procedures will be terminated upon completion of requirements as stated in the FFA. However, after implementation of the final remedial design, it may be terminated earlier upon a majority vote of the RAB membership.

VII. Signatories to the Membership Mission Statement and Operating Procedures

IN WITNESS WHEREOF, we have set our hand this _____ day of _____ 1995.

MCAS El Toro BRAC Environmental Coordinator

RAB Community Co-Chair

U. S. Environmental Protection Agency RPM

California Department of Toxic Substances Control
RPM

The original "Mission Statement and Operating Procedures", dated February 28, 1995, is on file at Marine Corps Air Station (MCAS) El Toro, Environment and Safety. It was signed by Mr. Joseph Joyce, Base Realignment and Closure (BRAC), Environmental Coordinator (BEC), Ms. Marcia Rudolph, Restoration Advisory Board (RAB), Community Co-chair, Ms. Bonnie Arthur, Environmental Protection Agency (EPA), Remedial Project Manager, and Mr. Juan Jimenez, Department of Toxic Substances Control (DTSC), Remedial Project Manager.

MARINE CORPS AIR STATION EL TORO
Installation Restoration Program - Restoration Advisory Board
Mission Statement and Operating Procedures

Subcommittees

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- (7) Operable Unit Three (OU3) - All other sites

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f. Ad hoc subcommittees will be established as needed and will be limited to one year.

g. Subcommittees may request the participation, involvement and advise of regulatory agency members.

MCAS El Toro RAB Subcommittees - Chairperson Summary

SUBCOMMITTEE NAME/Chairperson & phone numbers

1. BRAC CLEANUP PLAN

Greg Hurley (949) 719-2289 Day (direct dial)
 (949) 497-1968 Home
 (949) 718-6708 Fax

2. CERFA/EBS (*NO LONGER NECESSARY, REPORT FINALIZED APRIL 1995*) Community Environmental Response Facilitation Act/Environmental Baseline Survey

3. COMMUNITY RELATIONS

Marcia Rudolph (714) 770-9555 Day
 (714) 830-9816 Home
 (714) 830-4698 Fax

4. COMPLIANCE/RFA (*NOT AN IR PROGRAM ACTIVITY*) Compliance/Resource Conservation and Recovery Act - Facility Assessment

5. GENERAL ENVIRONMENTAL

Enid Cohn (714) 573-5835 Day
 (714) 573-8043 Home

*6. OPERABLE UNIT NO. 1 (OU1) GROUNDWATER

Don Zweifel (714) 937-1032 Day
 (714) 744-1031 Home
 (714) 532-1710 Fax

*7. OPERABLE UNIT NO. 2 (OU2) LANDFILLS

Dr. Charles Bennett, Ph.D. (714) 773-5525 Day

*8. OPERABLE UNIT NO. 3 (OU3) ALL OTHER SITES

Don Zweifel (714) 937-1032 Day
 (714) 744-1031 Home
 (714) 532-1710 Fax

* = currently active

MCAS El Toro RAB Subcommittees - Member Summary

Revised April 1999

SUBCOMMITTEE NAME/Number of members

1. BRAC CLEANUP PLAN - 6 people
2. CERFA/EBS - *(NO LONGER NECESSARY, REPORT FINALIZED APRIL 1995)*
Community Environmental Response Facilitation Act/Environmental Baseline Survey
3. COMMUNITY RELATIONS - 5 people
4. COMPLIANCE/RFA - *(NOT AN IR PROGRAM ACTIVITY)*
Compliance/Resource Conservation and Recovery Act - Facility Assessment
5. GENERAL ENVIRONMENTAL - 4 people
- *6. OPERABLE UNIT NO. 1 (OU1) GROUNDWATER - 6 people
- *7. OPERABLE UNIT NO. 2 (OU2) LANDFILLS - 6 people
- *8. OPERABLE UNIT NO. 3 (OU3) ALL OTHER SITES -- 4 people

NOTE: There are 32 subcommittee slots currently filled by 12 people.

<u>RAB Member</u>	<u>Subcommittees Represented On</u>
Joe Barney	3, 6, 7
Dr. Charles Bennett	1, 5, 6, 7
Enid Cohn	1, 5, 8
Roy Herndon	6
Peter Hersh	6
Gregory Hurley	1, 3
Robert McVicker	6, 7
Fred Meier	7
Marcia Rudolph	1, 3, 5, 8
Jerry Werner	1, 7, 8
Bob Woodings	3
Don Zweifel	1, 2, 3, 5, 6, 7, 8

* = currently active



CHARLES V. (CHUCK) SMITH
CHAIRMAN OF THE BOARD OF SUPERVISORS
SUPERVISOR, FIRST DISTRICT

April 14, 1999

The Honorable Marcia Rudolph
City of Lake Forest
23161 Lake Center Drive, Suite 100
Lake Forest, CA 92630

Dear Councilwoman Rudolph,

Thank you for your March 7, 1999 letter regarding inactive landfill sites 3 and 5 at the Marine Corps Air Station (MCAS) El Toro. I understand your concerns and appreciate you sharing your comments with me regarding the ongoing investigation and remediation of these landfill sites by the Department of the Navy (DON).

Your letter comments that the DON has declined to conduct landfill characterization and identification studies at landfill sites 3 and 5 and requests that the LRA conduct such studies itself. I cannot recommend that the County undertake these studies. First, the LRA does not presently own or operate Sites 3 and 5. As such, the LRA does not have access to these sites for the performance of landfill characterization studies. Second, the funding and performance of additional landfill characterization activities could create new environmental problems and potential liabilities for the County of Orange. EPA has noted that invasive geophysical explorations of municipal landfills (e.g. drilling into or through wastes or excavating test pits) may create new conduits for the migration of waste materials and pollutants and create health and safety risks to workers. These costs and potential liabilities should not be borne by the County of Orange. If such tasks are necessary, they should be undertaken and paid for by DON.

Third, as you have mentioned, DON is responsible for the cleanup and any associated investigation and remediation of Sites 3 and 5 and should conduct and pay for such investigation when and if required by law. DON is responsible under a number of laws for the investigation and remediation of the environmental conditions it caused. Such responsibility should not be shifted now or in the future to the taxpayers of Orange County.

Finally, it is LRA's understanding that EPA and other regulatory agencies do not believe that additional landfill characterization activities are warranted if DON implements a remedy that includes a flexible membrane liner (FML).

Again, I appreciate your comments and look forward to working with you and other members of the Restoration Advisory Board, the public and DON to reach an appropriate solution for remediation of these landfill sites.

Should you have any additional questions, please feel free to call Courtney Wiercioch, Manager, MCAS El Toro Master Development Program at (714) 834-5111.

Sincerely,

A handwritten signature in cursive script that reads "Charles V. Smith".

Charles V. Smith, Chairman
MCAS El Toro Local Redevelopment Authority

cc: Board of Supervisors
County Executive Officer
County Council
Joseph Joyce, BRAC
Glen Kistner, US EPA
Tayseer Mahmoud, DTSC
Greg Hurley, RAB

Remediation of Shallow Soil Sites

Installation Restoration Program

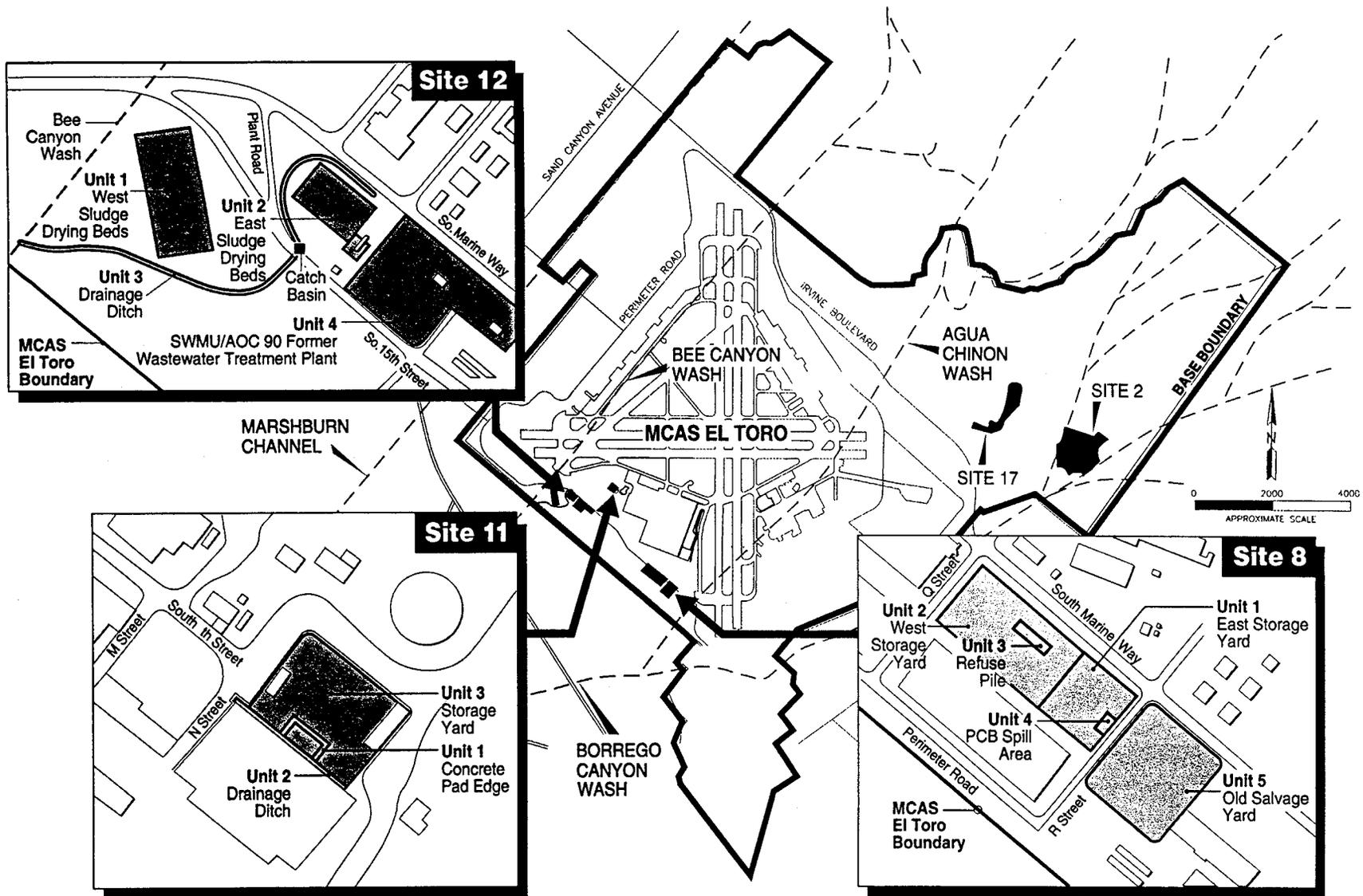
Sites 8, 11 and 12

Marine Corps Air Station, El Toro

Background

- OU 3A Sites
(4,6,8,9,10,11,12,13,15,16,19,20,21,22)
- June 1997 RI Report
- Most Sites were recommended for NFA
- NFA ROD signed September 1997
- Portions of Sites 8, 11 and 12 recommended for remedial action
- January 1998 FS evaluated remedial alternatives

MCAS El Toro Location Map – Installation Restoration Program Sites 8, 11, and 12

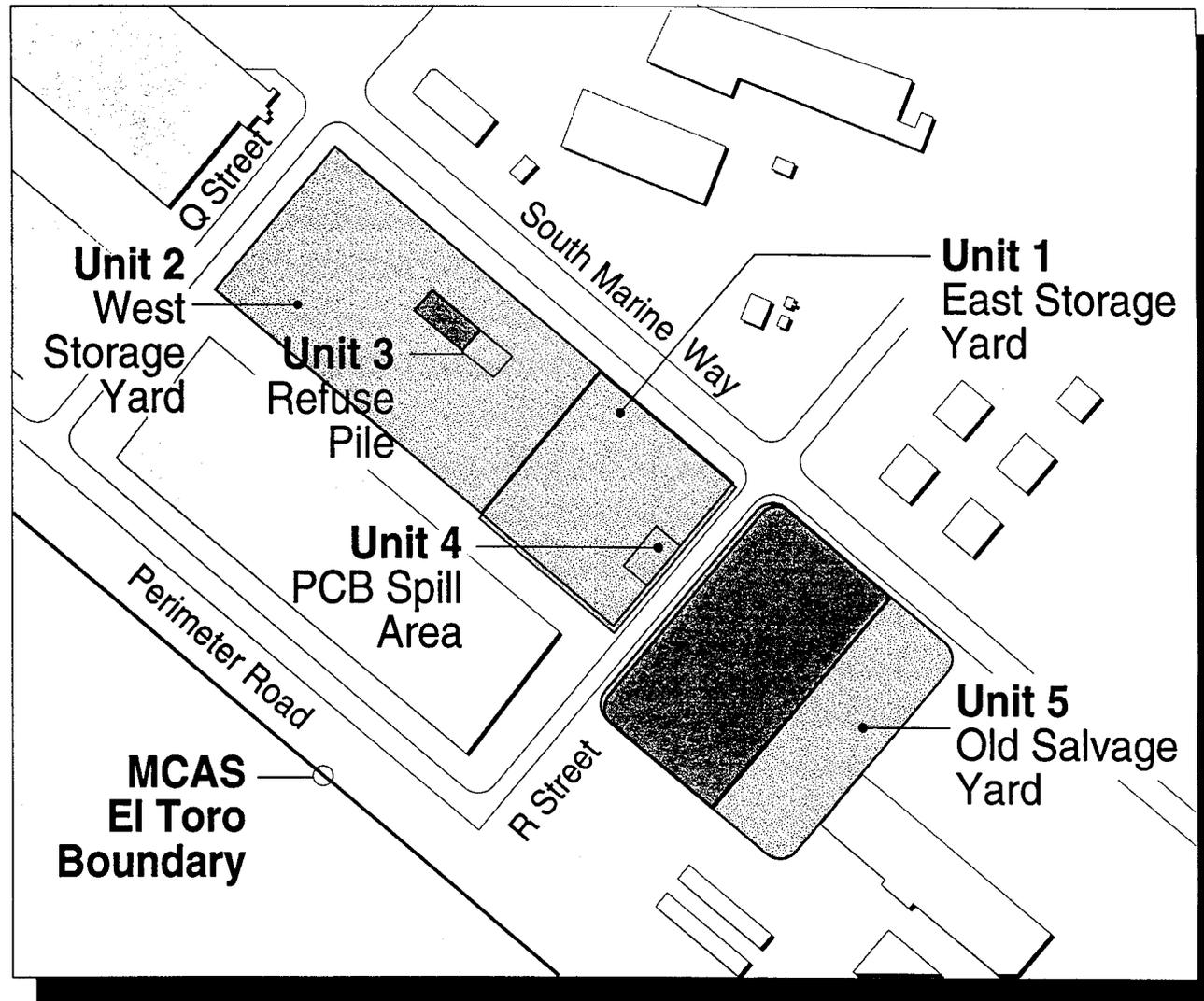


MCAS El Toro is shown along with the units that comprise Sites 8, 11, and 12.

Site 8 - DRMO Storage Yard

Legend

-  Area Recommended for Remedial Action
-  Area Recommended for No Further Action
-  Building or Pad
-  Unit Boundary
-  Improved Roads
-  Base Boundary

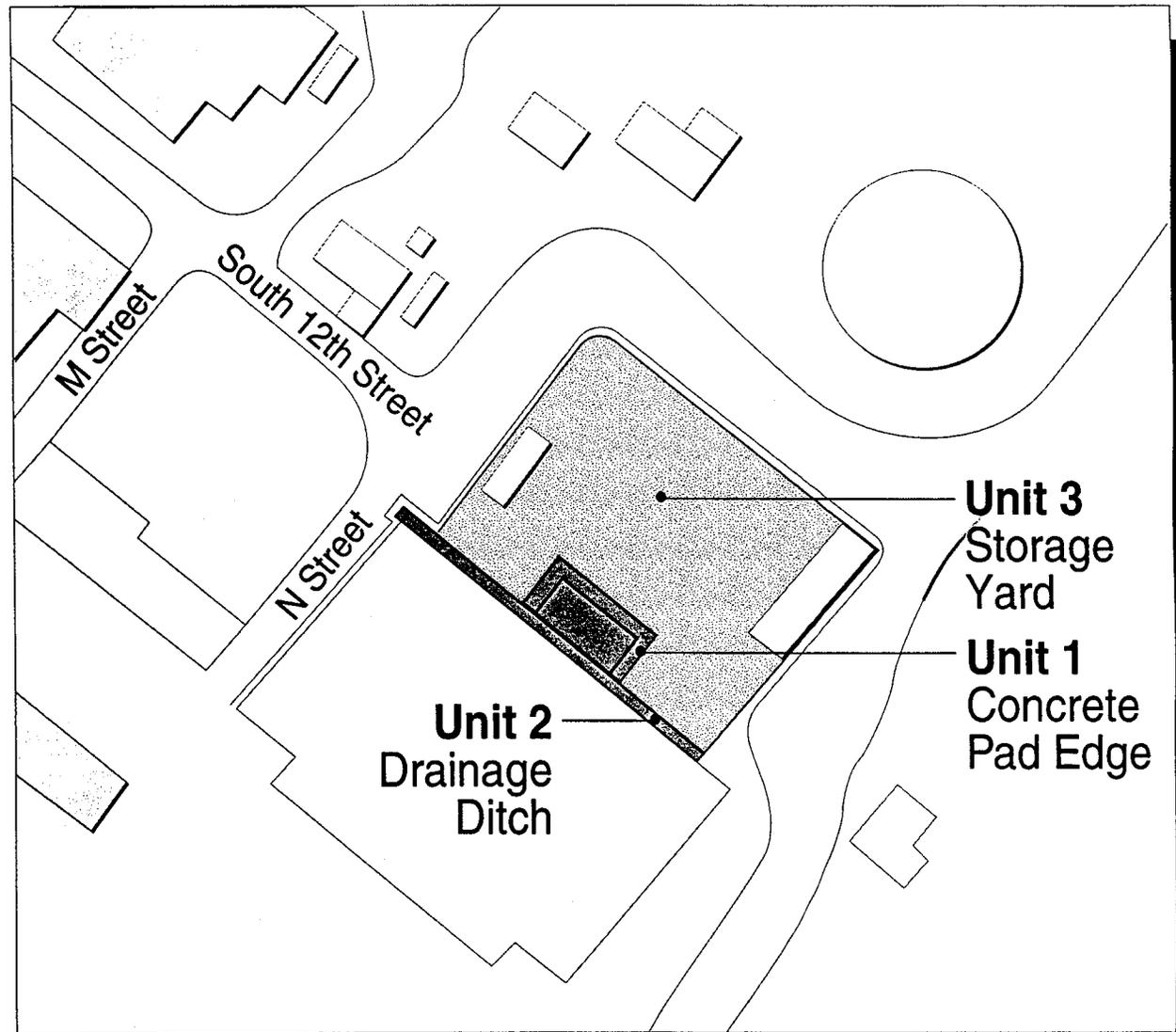


Portions of Units 3 and 5 are recommended for remedial action.

Site 11 - Transformer Storage Area

Legend

-  Area Recommended for Remedial Action
-  Area Recommended for No Further Action
-  Building or Pad
-  Unit Boundary
-  Improved Roads
-  Base Boundary

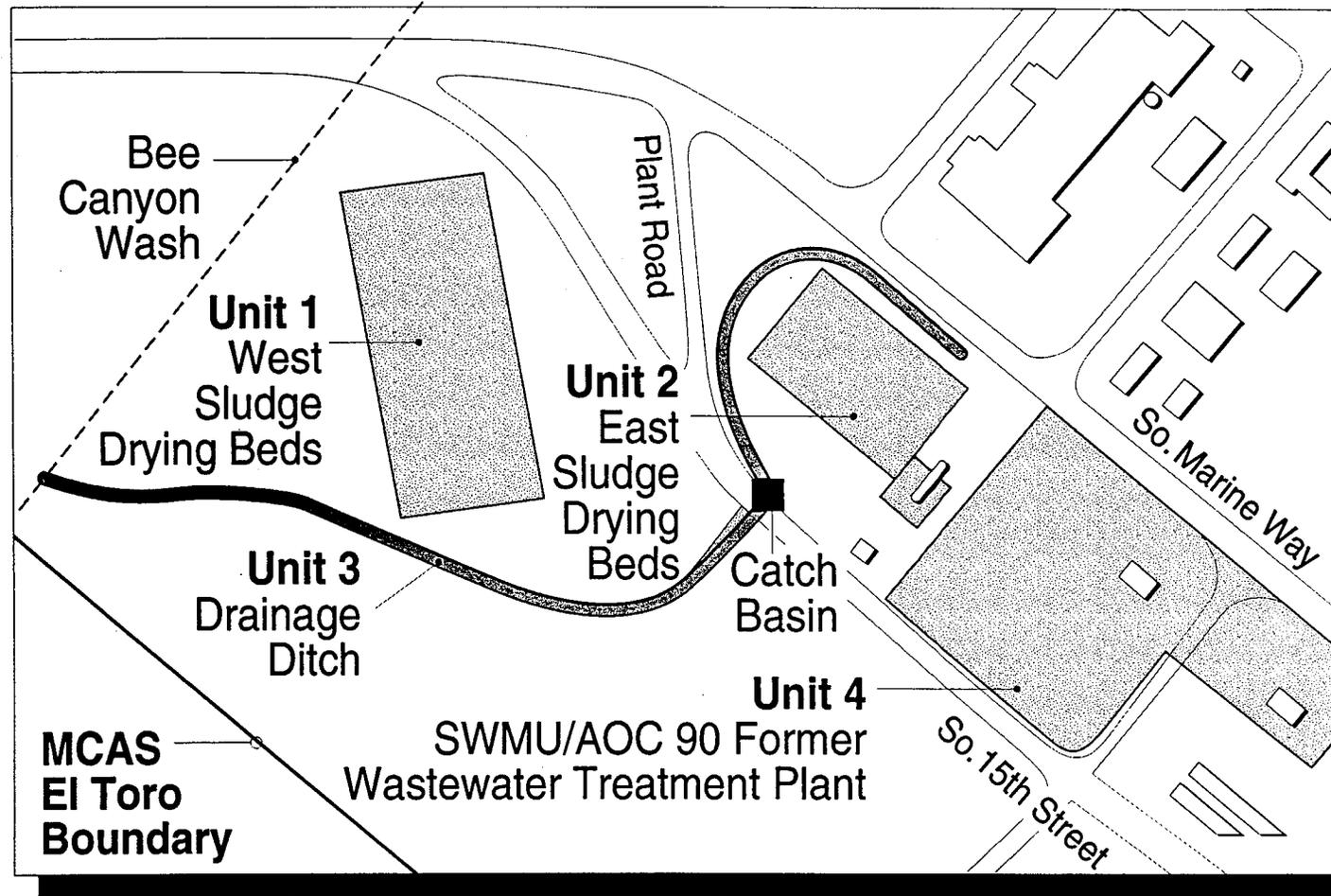


Units 1 and 2 are recommended for remedial action.

Site 12 - Sludge Drying Beds

Legend

-  Area Recommended for Remedial Action
-  Area Recommended for No Further Action
-  Building or Pad
-  Unit Boundary
-  Improved Roads
-  Base Boundary



Unit 3 is recommended for remedial action.

Recommended for Further Action

- Site 8 Unit 3 Refuse Pile
 - Risk Driver - PCB
 - Residential Risk - $4.1E-05$ (4 out of 100,000)
- Site 8 Unit 5 Old Salvage Yard
 - Risk Driver - PAH
 - Residential Risk - $1.0E-04$ (1 out of 10,000)
- Site 11 Unit 1 Concrete Pad Edge
 - Risk Driver - PCB
 - Residential Risk - $9.1E-05$ (9 out of 100,000)

Recommended for Further Action

- Site 11 Unit 2 Drainage Ditch
 - Risk Driver - PCB
 - Residential Risk - $5.9E-06$ (6 out of 1,000,000)
- Site 12 Unit 3 Drainage Ditch
 - Risk Driver - Arsenic
 - Residential Risk - $4.5E-05$ (5 out of 100,000)

Future Actions

- Proposed Plan (based on January 1998 FS)
May 1999
- Public Comment Period May/June
- Public Meeting May/June

Mr. Joseph Joyce
March 9, 1999
Page 2

cc: Mr. Glenn Kistner, SFD-8-2
Remedial Project Manager
U. S. Environmental Protection Agency
Region IX
Superfund Division
75 Hawthorne Street
San Francisco, California 94105-3901

Ms. Patricia Hannon
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

Mr. Gregory F. Hurley
Restoration Advisory Board Co-chair
620 Newport Center Drive, Suite 450
Newport Beach, California 92660-8019

Ms. Polin Modanlou
MCAS El Toro Local Redevelopment Authority
10 Civic Center Plaza, 2nd Floor
Santa Ana, California 92703

Mr. Bill Sedlak
OHM Remediation Services Corp.
2031 Main Street
Irvine, California 92614

Ms. Lynn Hornecker
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division - Code 5BME.LH
1220 Pacific Highway
San Diego, California 92132-5187



Department of Toxic Substances Control

Jesse R. Huff, Director
5796 Corporate Avenue
Cypress, California 90630



Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

March 9, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
AC/S, Environmental (1AU), BRAC Building #899
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

CLOSURE REPORT APPROVAL: TEMPORARY ACCUMULATION AREA (TAA) 77 AT MARINE CORPS AIR STATION (MCAS) EI TORO

The Department of Toxic Substances Control (DTSC) has reviewed the closure report for the above subject site dated December 1998 and the supplemental information dated March 1, 1999, prepared by OHM Remediation Services Corp. The report summarizes the results of the field activities conducted at TAA 77, a site which was used as a temporary hazardous waste storage area. The TAA 77 site is a fenced asphalt-paved area approximately 20 feet long and 10 feet wide located in the northwest quadrant of the Station.

Based on the report, the site-related residential cancer risk and non cancer hazard indexes are within the acceptable ranges. DTSC, therefore concurs with the findings and conclusions of the closure report, and the report is hereby approved.

If you have any questions, please contact Mr. Tayseer Mahmoud, Remedial Project Manager, at (714) 485-5418.

Sincerely,

Sharon Fair
Unit Chief
Base Closure Unit
Office of Military Facilities

cc: See next page



Department of Toxic Substances Control



Jesse R. Huff, Director
5796 Corporate Avenue
Cypress, California 90630

Winston Hickox
Secretary for
Environmental
Protection

Ray Davis
Governor

March 17, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
AC/S, Environmental (1AU), BRAC Building #899
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

COMMENTS ON TECHNICAL MEMORANDA FOR OIL WATER SEPARATORS (OWSs) 244, 388C, 392, 652, AND 676, UNDERGROUND STORAGE TANKS (USTs) 673B AND 380B, AND SOLID WASTE MANAGEMENT UNIT (SWMU) 273, MARINE CORPS AIR STATION (MCAS) EI TORO

The Department of Toxic Substances Control (DTSC) has reviewed eight (8) Technical Memoranda dated 1998 and received by us on February 19, 1999. These Technical Memoranda provide supporting documentation for the deletion of the eight (8) sites from the Base Realignment and Closure Cleanup Plan (BCP) (1999 update) for MCAS El Toro. The information provided includes historical records and current environmental program management plans and reports, and site inspections reports in support of the determination that the sites do not exist or that they were incorrectly designated as Environmental Locations of Concern (LOCs).

DTSC comments are as follows:

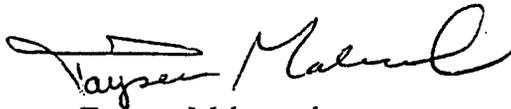
1. DTSC concurs with your determination that OWSs 244, 388C, 392, and 652 were incorrectly designated as LOCs. We also concur that UST 380B and SWMU 273 were incorrectly designated as LOCs. These LOCs can be deleted from the 1999 BCP.
2. DTSC will not be able to concur with your determination for OWS 676 until we have had a chance to inspect the area of this site. DTSC staff plans to conduct a visual inspection of the site on March 25, 1999. Please provide escorts to DTSC staff on March 25 to conduct inspection.

Mr. Joseph Joyce
March 17, 1999
Page 2

3. DTSC does not concur with your determination that UST 673B is a "phantom" site, because we do not accept your statement that a visual site inspection would reveal the presence of an underground storage tank. Please provide additional information to support your claim, or conduct a geophysical survey to verify the existence of the tank.

If you have any questions, please contact me at (714) 484-5418.

Sincerely,



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

cc: Mr. Glenn Kistner, SFD-8-2
Remedial Project Manager
U. S. Environmental Protection Agency
Region IX, Superfund Division
75 Hawthorne Street
San Francisco, California 94105-3901

Ms. Patricia Hannon
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

Mr. Gregory F. Hurley
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MCAS El Toro Local Redevelopment Authority
10 Civic Center Plaza, 2nd Floor
Santa Ana, California 92703



Department of Toxic Substances Control

Jesse R. Huff, Director
5796 Corporate Avenue
Cypress, California 90630



Gray Davis
Governor

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March 12, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
AC/S, Environmental (1AU), BRAC Building #899
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

FEDERAL FACILITY AGREEMENT (FFA) SCHEDULE, MARINE CORPS AIR STATION (MCAS) EI TORO

The Department of Toxic Substances Control (DTSC) has received your letter dated March 8, 1999, requesting extensions of the deadlines set forth in Appendix A of the FFA for MCAS El Toro. A revised FFA Appendix A schedule dated March 8, 1999 accompanied your letter as Enclosure #1. Your letter outlined justification for the requested schedule extensions.

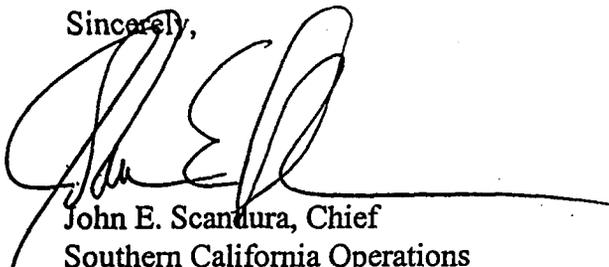
As indicated in your letters, a seven-week extension is needed for Operable Unit (OU)-2B (Landfill Sites 2 & 17) draft final Record of Decision (ROD) to enable the Marines to respond to regulatory agencies significant comments on monitored natural attenuation at Site 2 and to coordinate efforts with the U.S. Fish and Wildlife Service. The proposed new date would change from April 8, 1999 to May 27, 1999. You also requested a two-month extension for the submittal of draft ROD for OU-3 (Sites 8, 11, and 12) due to regulatory agencies significant comments on the draft and draft final Proposed Plan. The proposed new date for submittal of draft ROD to the regulatory agencies would change from April 7, 1999 to June 7, 1999. The letter also requested a nineteen-week extension for the submittal of draft Remedial Investigation (RI) report for OU-3 (Sites 7 and 14) due to more critical resource requirements the groundwater and landfill programs. The new due date for submittal of the draft RI to the regulatory agencies would change from March 17, 1999 to July 29, 1999.

DTSC agrees that good cause exists for the extensions and we hereby grant your request for changes to the FFA schedule.

Mr. Joseph Joyce
March 12, 1999
Page 2

If you have any questions, please call Mr. Tayseer Mahmoud, Remedial Project Manager, at (714) 484-5418.

Sincerely,



John E. Scandura, Chief
Southern California Operations
Office of Military Facilities

cc: Mr. Glenn Kistner
Remedial Project Manager
U. S. Environmental Protection Agency
Region IX
Superfund Division (SFD-8-2)
75 Hawthorne Street
San Francisco, California 94105-3901

Ms. Patricia Hannon
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

Mr. Peter Janicki
California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, California 95826

Mr. Steven Sharp
County of Orange
Environmental Health Division
Solid Waste Local Enforcement Agency
2009 E. Edinger Avenue
Santa Ana, California 92705



Department of Toxic Substances Control

Jesse R. Huff, Director
5796 Corporate Avenue
Cypress, California 90630



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March 12, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
AC/S, Environmental (1AU), BRAC Building #899
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

REQUEST FOR LAND USE COVENANT FOR LANDFILL SITES 3 & 5 RECORD OF DECISION, MARINE CORPS AIR STATION (MCAS) EI TORO

As was discussed during a recent conference call between you, Tayseer Mahmoud, Aaron Yue, and others, the Department of Toxic Substances Control (DTSC) requests that the Department of Navy (DoN) enter with the State into a Land Use Covenant (LUC) for Environmental Restrictions. Whenever there is hazardous waste left in place at concentrations greater than would be allowable for unrestricted land use, institutional controls must be put in place to protect the remedy, restrict public access and protect public health, restrict digging or drilling of drinking water wells, allow access to the site for monitoring, etc. At MCAS El Toro, the DoN has determined that institutional controls are required for the landfill sites to protect public health and the environment and to protect the remedy, i.e., landfill cap.

As referenced in California Civil Code Section 1471, DTSC customarily utilizes the LUC for all sites with residual contamination as an instrument to document institutional controls and use restrictions. As authorized by California Health and Safety Code Sections 25202.5, 25221, and 25230, and by California Code of Regulations sections 66264.94 and 68500.35(c), DTSC may enter into an agreement with a landowner to impose an easement, covenant, restriction, servitude or any other combination thereof on land. The LUC would ensure that the institutional controls are maintained by future owners, would run with the land, and would enable DTSC and/or the Regional Water Quality Control Board (RWQCB) to have immediate ability to enforce violations of the institutional controls in state court.

Mr. Joseph Joyce
March 12, 1999
Page 2

Prior to DTSC's approval of a Remedial Action Plan or Record of Decision (RAP/ROD) or concurrence on associated property transfers, DTSC must have assurance that the current property owner will enter into a LUC with DTSC. At closing federal facilities where the Department of Defense and/or the designated service branch declines to enter into a LUC with DTSC, DTSC requires that there also be a formal agreement, such as a Consent Agreement, between the future landowner and DTSC prior to DTSC's approval of the RAP/ROD. In such an agreement, the future landowner promises to enter into an LUC with the state at the time of property transfer, prepared in accordance with the provisions of California Civil Code, section 1471.

In the event that the future landowner is not willing to enter into a consent agreement with DTSC, and the DoN is unwilling to enter into a land use covenant with DTSC, then DTSC will be unable to approve the respective RAP/ROD or land transfer. In such case, the remedy would need to be changed so as to permit unrestricted future land use.

Therefore, DTSC requests that language similar to the following be added to Sections 7.2.1 and 7.3.2, Institutional Controls, Draft Final Record of Decision for Sites 3 & 5:

"A Land Use Covenant between the DoN and the Department of Toxic Substances Control and the Regional Water Quality Control Board will be the mechanism to implement the above-mentioned institutional controls, in accordance with state policy. The covenant is a legally-binding agreement, which will include a combination of easements, covenants, restrictions, and servitudes. The easements will allow state representatives to enforce the institutional controls, have access to the property in order to ensure that the remedy is protected and to evaluate the monitoring system via site inspection. The Land Use Covenant will include a legal description of the property and/or contaminated areas, parcel maps, and detailed site maps which show restricted areas. In addition, the Land Use Covenant will include information summarizing the remedial actions completed at the specific sites, and provisions for terminating the restrictions in the event that they may no longer apply. The provisions in the Land Use Covenant will be binding upon all future owners until legally terminated; that is, they will "run with the land." The Land Use Covenant will be recorded with the deed of transfer of real property by the County of Orange in accordance with state law. The DoN shall provide the departments with a copy of the land use controls which have been appropriately recorded."

Mr. Joseph Joyce

March 12, 1999

Page 3

We will appreciate your review of this request. If requested, we will be available to meet with you and/or the Local Redevelopment Authority to discuss the policy, procedure, and format for the LUC. DTSC staff look forward to working with you to expedite cleanup and reuse of MCAS - El Toro. If you have questions or need further information in this matter, please call me at (714) 484-5433 or Tayseer Mahmoud at (714) 484-5418. Thank you.

Sincerely,



Sharon Fair, Chief
Base Closure and Reuse Unit
Office of Military Facilities

cc: Mr. Glenn Kistner
Remedial Project Manager
U. S. Environmental Protection Agency
Region IX
Superfund Division (SFD-8-2)
75 Hawthorne Street
San Francisco, California 94105-3901

Ms. Patricia Hannon
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

Mr. Peter Janicki
California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, California 95826

Mr. Joseph Joyce
March 12, 1999
Page 4

cc: Mr. Steven Sharp
County of Orange
Environmental Health Division
Solid Waste Local Enforcement Agency
2009 East Edinger Avenue
Santa Ana, California 92705

Ms. Polin Modanlou
MCAS El Toro Local Redevelopment Authority
10 Civic Center Plaza, 2nd Floor
Santa Ana, California 92703

Mr. Gregory F. Hurley
Restoration Advisory Board Co-chair
620 Newport Center Drive, Suite 450
Newport Beach, California 92660-8019

Dr. Dante Tedaldi
Bechtel National, Inc.
1230 Columbia Street, Suite 400
San Diego, California 92101-8502

Mr. Andy Piszkin
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division - Code 5BME.AP
1220 Pacific Highway
San Diego, California 92132-5187

Department of Toxic Substances Control

Jesse R. Huff, Director
5796 Corporate Avenue
Cypress, California 90630



Gray Davis
Governor

March 10, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
AC/S, Environmental (1AU), BRAC Building #899
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

COMMENTS ON DRAFT OPERATION AND MAINTENANCE MANUAL, SOIL VAPOR EXTRACTION (SVE) SYSTEM DEMONSTRATION, SITE 24, MARINE CORPS AIR STATION (MCAS) EI TORO

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated December 1998 and received by us on February 18, 1999, prepared by Earth Tech, Inc. The document describes the operation and maintenance procedures for the in situ SVE system demonstration at Site 24, MCAS El Toro. The manual contains several detailed sections that provide information on the overall capabilities of the SVE system, equipment description, process control, operation and maintenance duties, and procedures to start and operate the system.

DTSC comments are as follows:

General Comments:

1) The draft final O&MM does not propose any routine reporting activities. I recommend expanding the existing *Monthly Progress Reports* to also briefly report on the salient results of routine process operations and sampling and analyses (influent and emission monitoring results, carbon change-out events, significant and unusual operational events, etc.), and also on the items noted in *Specific Comment No. 4*, below.

Specific Comments:

2) Page 3-6, Section 3.2.1., Ventfield Subsystem Start-up Preparation and page 3-9, Section 3.3, System Start-up Procedures: I recommend that the use of passive air

Mr. Joseph Joyce
March 10, 1999
Page 2

inlets at the well head, or at any other location for that matter, is avoided when possible. Decreasing the concentration of constituents in the influent air stream adversely affects the adsorption efficiency of the activated carbon. If additional air flow is required by the blower(s), I recommend that additional wells are placed on-line or on standby mode, instead of introducing dilution air.

3) *Page 3-9, Section 3.3, System Start-up Procedures, and page 3-11, Section 3.4, System Shutdown Procedures:* I recommend minimizing the time during which the ambient air inlet valves (V-115 and V-116) are open, for the same reason as above.

4) *Page 3-16, Section 3.5.4, Operating Records:* Information pertaining to individual well operation is important. I recommend that an integrated soil vapor extraction well log is developed to track the operating times of all individual wells (on and off dates). The log should also include periodic air flow rate-, temperature-, vacuum-, air inlet valve position-, and PID readings for each well. The well log should be submitted with the *Monthly Progress Reports* to the appropriate agencies.

5) *Page 3-17, Figure 3-1, Section 3.5.4, Operating Records:* The *O&M Sample Data Form* shown in *Figure 3-1* is different from that shown in *Figure 6-1*, page 6-12, of the *Draft Final EDR*. Please use the O&M form proposed in the *Draft Final EDR*.

6) *Page 4-1, Section 4.1, Granular Activated Carbon:* *Section 4.1* does not appear to be applicable to the 20,000-pound GAC vessels. Spent GAC is normally removed from the site by the GAC vendor at the time replacement fresh GAC is brought on site. Perhaps this section is intended for the smaller, stand-alone GAC systems that service individual wells at remote or isolated locations. Please clarify the applicability of *Section 4.1*.

If you have any questions, please call me at (714) 484-5418.

Sincerely,



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

cc: See Next Page



Department of Toxic Substances Control



Jesse R. Huff, Director
5796 Corporate Avenue
Cypress, California 90630

Gray Davis
Governor

Newton H. Hickox
Secretary for
Environmental
Protection

March 16, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
AC/S, Environmental (1AU), BRAC Building #899
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

CLOSURE REPORT APPROVAL: TEMPORARY ACCUMULATION AREA (TAA) 314 AT MARINE CORPS AIR STATION (MCAS) EI TORO

The Department of Toxic Substances Control (DTSC) has reviewed the closure report for the above subject site dated December 23, 1998, and received by us on January 20, 1999, prepared by OHM Remediation Services Corp. The report summarizes the results of the field activities conducted at TAA 314. It is also known as Solid Waste Management Unit (SWMU) 269, a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) site used for temporary storage of hazardous waste. The site consists of a fuel locker placed on a concrete-paved area located next to Oil Water Separator 314C near Building 314 in the southwestern quadrant of the Station.

Based on the report, the site-related residential cancer risk and non cancer hazard indexes are within the acceptable ranges. DTSC, therefore concurs with the findings and conclusions of the closure report, and the report is hereby approved.

If you have any questions, please contact Mr. Tayseer Mahmoud, Remedial Project Manager, at (714) 484-5418.

Sincerely,

Sharon Fair
Unit Chief
Base Closure Unit
Office of Military Facilities

cc: See next page

Mr. Joseph Joyce
March 16, 1999
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cc: Mr. Glenn Kistner, SFD-8-2
Remedial Project Manager
U. S. Environmental Protection Agency
Region IX
Superfund Division
75 Hawthorne Street
San Francisco, California 94105-3901

Ms. Patricia Hannon
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

Mr. Gregory F. Hurley
Restoration Advisory Board Co-chair
620 Newport Center Drive, Suite 450
Newport Beach, California 92660-8019

Ms. Polin Modanlou
MCAS El Toro Local Redevelopment Authority
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Mr. Bill Sedlak
OHM Remediation Services Corp.
2031 Main Street
Irvine, California 92614

Ms. Lynn Hornecker
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division - Code 5BME.LH
1220 Pacific Highway
San Diego, California 92132-5187



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 26, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
AC/S Environmental (1AU)
MCAS El Toro
P.O. Box 95001
Santa Ana, CA 92709-5001

Re: Marine Corps Air Station (MCAS) El Toro, Federal Facility Agreement (FFA) Schedule
Change Request

Dear Mr. Joyce:

The United States Environmental Protection Agency (EPA) has received your letters dated March 8, and March 23, 1999, requesting agency approval of changes to the FFA schedule for MCAS El Toro. The FFA changes requested in your March 8 letter are hereby approved.

Your letter dated March 23, requested a six week extension to submit the draft final Proposed Plan for Operable Units (OUs) 1 and 2A, due to continued negotiations with the Orange County and Irvine Ranch Water Districts, and significant comments on the draft Proposed Plan submitted by the regulatory agencies.

While EPA remains fully supportive of the ongoing negotiations between the Navy and the Water Districts (with the expectation of an agreement), we remain concerned about the length of time the negotiations have taken. EPA is willing therefore to grant the Navy a 30 day extension until May 1, 1999, to submit the draft final Proposed Plan for OUs 1 and 2A, provided the Navy immediately schedules meetings and/or conference calls with the regulatory agencies to resolve regulatory agency comments and to update the agencies on the status of the negotiations.

I look forward to hearing from you. Please contact me at (415) 744-2210 to arrange the meetings/conference calls.

Sincerely,

A handwritten signature in cursive script that reads "Glenn R. Kistner".

Glenn R. Kistner
Remedial Project Manager
Federal Facilities Cleanup Branch

cc: Ms. Patricia Hannon, RWQCB
Mr. Gregory Hurley, RAB Co-Chair
Mr. Tayseer Mahmoud, DTSC
Ms. Polin Modanlou, LRA
Mr. Andy Piszkin, SWDIV