



# Department of Toxic Substances Control



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July 3, 2001

Mr. Dean Gould  
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## ADDENDUM TO THE FINAL SUPPLEMENTAL WORK PLAN, CLOSURE OF VARIOUS TEMPORARY ACCUMULATION AREAS AND RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) FACILITY ASSESSMENT SITES, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above document dated January 17, 2001. According to the document, this addendum presents changes to the *Final Supplemental Work Plan, Closure of Various Temporary Accumulation Areas and RCRA Facility Assessment Sites (FSWP)*, prepared by OHM Remediation Services Corporation, dated September 26, 1997.

After review of the document, DTSC has the following comments.

1. Executive Summary: The first sentence states that this addendum documents changes to the *Final Supplemental Work Plan, Closure of Various Temporary Accumulation Areas and RCRA Facility Assessment Sites*, dated September 26, 1997, Prepared by OHM Remediation Services Corporation.

DTSC understands that a Final Supplemental Work Plan was not issued. However, the Draft Supplemental Work Plan was issued March 19, 1997 and DTSC subsequently provided concurrence on the document. Please clarify this in the text and provide associated dates.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

2. Section 1.4, Scope of Work and Assumptions: It is unclear if this text replaces a portion of or all of the text in this section of the supplemental work plan. Specifically, the following text was included in the supplemental work plan, but was not included in the addendum. Please revise as necessary.

"List of hazardous wastes that may have been accumulated at the TAAs, and the chemicals of potential concern (COPC) are included on Table 2.-1, 'Chemicals of Potential Concern at (12 Initial) TAA Sites.' These waste lists and COPCs were compiled based on interviews with the MCAS El Toro Environmental Branch personnel, and review of the *RFA Addendum* (Bechtel National, Inc. 1996).

#### Assumptions

The closure of the TAA and RFA sites listed on Table 1-1 will be handled as a single project, however, site-specific Closure Certification Reports will be prepared for each site. Each site Closure Certification Report will include the summary and documentation of the cleanup; site maps showing locations of samples; final records; health and safety documents; disposal records and manifests; fact sheets, and related site-specific documentation.

Closure of the TAAs under this DO does not include the removal or disposal of containerized hazardous waste or materials that may remain at any of the sites to be closed. Any containerized hazardous wastes or materials found at the sites during construction will be turned over to the base for use, recycling, or disposal.

OHM will initially perform verification soil sampling at RFA sites unless earlier data are satisfactory and complete for initiating remedial measures. After review of verification sampling results, decisions will be made regarding remedial measures at specific RFA sites. Additional assumptions are included in the MCAS EL Toro Detailed Plan (OHM 1995a)."

2. Section 4, Facility Decontamination Process: Type 1 and 2 TAA facilities will be dry vacuumed to remove dust and debris. If evidence of spillage (staining on or cracks in the concrete pad) is apparent, the structure will be decontaminated with water, as necessary. Further, Type 3 and 4 TAA facilities will not be decontaminated with water.

If the concrete pad will not be decontaminated with water and rinsate samples are not collected, please describe how it will be verified that the concrete pad has been decontaminated.

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3. Section 6, Sampling Strategy and Rationale: The fourth paragraph provides a list of sampling activities to be conducted at the TAA sites. According to the list, if there are no significant cracks or stains on the surface of the concrete pad based on visual inspection, then a soil sample will not be collected from beneath the surface of the concrete pad.

In cases where the concrete pad has been replaced and the condition of the previous pad is unknown, a soil sample should be collected from beneath the surface of the concrete pad at the sump or lowest area of the pad.

4. Attachment 2, Quality Assurance Project Plan, Table 3-1, Project-Required Reporting Limits and Preliminary Remediation Goals: According to the United States Environmental Protection Agency (EPA), Region X, Preliminary Remediation Goals, dated November 2000, the following are applicable for residential soil. Please revise Table 3-1 accordingly.

- 1,1,1-trichloroethane: 630,000 micrograms per kilogram ( $\mu\text{g}/\text{kg}$ )
- cis-1,3-dichloropropene and trans-1,3-dichloropropene should correspond to the PRG for 1,3-dichloropropene: 700  $\mu\text{g}/\text{kg}$
- methyl tertiary butyl ether (MTBE): 17,000  $\mu\text{g}/\text{kg}$

5. Attachment 2, Quality Assurance Project Plan, Section 1.1, Objective: The last sentence in the section states, "The California Regional Water Quality Control Board (RWQCB) has regulatory oversight for these sites."

DTSC provides regulatory oversight for the TAA and RFA sites under the California Health and Safety Code (HSC).

If you have any questions, please contact me at (714) 484-5395.

Sincerely,



Triss M. Chesney, P.E.  
Remedial Project Manager  
Southern California Branch  
Office of Military Facilities

cc: See nex page



