



Department of Toxic Substances Control



Edwin F. Lowry, Director
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M60050.002554
MCAS EL TORO
SSIC #5090.3

August 17, 2001

Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
Base Realignment and Closure
P.O. Box 51718
Irvine, California 92619-1718

DRAFT PROPOSED PLAN, OPERABLE UNIT (OU) 3, INSTALLATION
RESTORATION PROGRAM (IRP) SITE 16, CRASH CREW TRAINING PIT NO. 2,
MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above document
dated June 2001, and received by this office on June 19, 2001. The draft Proposed
Plan (PP) proposes no action for soil and long-term groundwater monitoring with deed
restrictions as the remedy for IRP Site 16, Crash Crew Training Pit No. 2. Site 16 is
located in the northwest quadrant of the station, in the center of the airfield near the
intersection of Runways 34-16 and 25-07. The site consists of three unlined pits
formerly used for crash crew (firefighter) training.

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

General Comment

DTSC also provided comments on the associated Draft Final Phase II Focused
Feasibility Study (FFS) Report for Site 16. DTSC comments included questions
regarding the preferred remedial alternative (no action for soil and long-term
groundwater monitoring with deed restrictions) identified in the draft PP. The summary
of the FFS and preferred remedy presented in the draft PP may be affected by the
resolution of comments on the FFS.

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Specific Comments

1. Page 2, Remedial Investigation Results, Groundwater: Please include the maximum concentration of trichloroethene (TCE), the predominant chemical detected, in groundwater.
2. Page 3, MCAS El Toro Site Location Map - Installation Restoration Program Site 16: The VOC plume in groundwater is shown as a blue shaded area. Please provide the concentration that correlates to the boundary of the plume.
3. Page 7, Characterizing and Evaluating Site Risks: The fourth paragraph states, "The non-cancer hazard index risk exceeded 1 only at Unit 3 for soil. Cancer and non-cancer risks of this degree require further evaluation to determine whether the risks are allowable or further action is required."

Please provide information regarding the evaluation used to determine whether the hazard index at Unit 3 are allowable or not. This information should support the decision for no further action for soil at Unit 3 as summarized in the section for "Remedial Investigation Conclusions."

4. Page 14, Applicable or Relevant and Appropriate Requirements for Remediation of VOC Contamination at Site 16, The California EPA Department of Toxic Substances Control (DTSC): This section lists the California codes with substantive requirements that have been determine to be State ARARs for land-use controls. Please add California Health and Safety Code subparagraphs 25232(b)(1)(A) through (E).

In addition to the comments provided above, comments prepared by the DTSC Public Participation Unit to refine the language of the PP are enclosed. If you have any questions, please contact me at (714) 484-5395.

Sincerely,



Triss M. Chesney, P.E.
Remedial Project Manager

Enclosure

cc: See next page

Mr. Dean Gould
August 17, 2001
Page 3

cc: Ms. Nicole Moutoux
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TO: Triss Chesney
Remedial Project Manager

FROM: Kimberly Foreman *KAF*
Public Participation Specialist

DATE: August 13, 2001

SUBJECT: **COMMENTS ON PROPOSED PLAN FOR SITE 16, MARINE
CORPS AIR STATION EL TORO**

I have reviewed the Proposed Plan and have the following comments.

1. This is a very good Proposed Plan, and very well written. The language is clear enough for the general reader, and the amount of detail is appropriate for the level of interest expressed in the El Toro IRP.
2. The end of the text on page 1 is missing a line.
3. Page 2: I recommend switching the second and third paragraphs, so that the site description comes before the discussion of the investigations. It's not critical, but it would be a logical flow.
4. Page 2, top of second column, second line: There's a typo in the word "provides," which should be "provides."
5. Page 2, "Units 1 and 2," first paragraph: It would help clarify things if you could match up the general list ("aviation fuels, waste oils, and solvents") with the categories in the second sentence, e.g., "The solvents include volatile organic compounds (VOCs)," etc.
6. Page 5, AR File Location, third line: Since the subject of the sentence is "collection" rather than "documents," it should be "is available."
7. Page 5, Terms: Please add the terms "adsorption" and "natural attenuation" to the list.

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8. Page 5, Terms: The metals description needs a general definition before the specific statement about the naturally occurring ones.
9. Page 5, Terms: To the ROD definition, please add a reference to the Proposed Plan at the end, for example: "...public comments and concerns received throughout the process and in response to this Proposed Plan."
10. Page 6, "Identifying Chemicals of Potential Concern," second paragraph: This paragraph describes the finding for metals only, although the paragraph above talks about all contaminants of concern. If metals are the only contaminant to be discussed, please add wording to the effect of "For example, a comparison of the concentrations of the metals...." Or, please add a reference to the other contaminants of concern.
11. Page 6, Estimating Health Hazards, paragraph three: It would be clearer to say "for example" instead of "e.g.," since not everyone is familiar with that abbreviation.
12. Page 7, last paragraph, first sentence: This sentence would be clearer if the word "but" was substituted for "and," to emphasize the distinction between the findings for the cancer and non-cancer risks.
13. Page 9, first paragraph, third line: To clarify this slightly long sentence, it would help to insert a comma after the words "over time."
14. Page 9, Table 5: Please add an explanation of the length of time calculated for O&M cost. Is the amount shown the total for the life of the project, or for one year?
15. Page 10, first paragraph, last sentence: This sentence would be easier to read if the syntax were reversed: "Page 5 lists the locations where you can view the Final Focused Feasibility Study reports that provide..." Note that "provides" should be the plural "provide" since the subject is "reports."
16. Page 10, A.2., first sentence under the bullet: Please give a brief explanation of why Alternative 1 does not trigger an ARARs compliance evaluation.
17. Page 12, next to last line: Please insert the word "the" in front of "mailing coupon."
18. Page 13, boxed text at bottom right, line 6: Please delete the word "a" in front of "no further action," which sounds clearer.
19. Page 14, first paragraph: It would help to have a clear, simple statement saying what ARARs are, before the detailed explanation. For example, you could start the paragraph with a statement like, "ARAR's are the laws,

regulations, and guidelines that apply to remedial actions." Then you could continue with the lengthier explanation.

20. Page 15, Viola Cooper's title: I don't know if "Com." Is clear as an abbreviation for "Community." Possibly "Comm." would be better, or "Involv." could be abbreviated and "Community" spelled out.

21. Those are all my comments. Thank you for the opportunity to review this Proposed Plan.