



Opportunity
Ahead

MCAS EL TORO LOCAL REDEVELOPMENT AUTHORITY • *Janice M. Mittermeier, Executive Director*
MCAS EL TORO MASTER DEVELOPMENT PROGRAM • *Michael L. Lapin, Manager*

September 9, 1999

Glenn Kistner
Remedial Project Manager
Region IX
75 Hawthorne Street
San Francisco, CA 94015

Dear Glenn:

This is a follow up to our telephone conversation on September 7, 1999 regarding the draft Record of Decision (ROD) for Sites 8, 11 and 12 located at the former Marine Corps Air Station El Toro (MCAS El Toro). You've mentioned that in a conference call between the regulatory agencies and the Navy last week, the Navy agreed to finalize the ROD for Site 11 only, given that the issues and concerns raised by the LRA in comments submitted to the Navy on August 12, 1999 principally pertained to the sites 8 and 12.

While the primary focus of our comments submitted on August 12, 1999 was on the adequacy of the remedy proposed by the Navy for Sites 8 and 12, we raised two important issues with respect to the remedial actions proposed at Site 11. First, we noted that paving materials existing at all three sites, including Site 11, could be contaminated with hazardous substances and, if so, would need to be addressed. Second, we noted that it was unclear from the draft ROD whether the cancer and non-cancer risk levels posed by hazardous constituents present at Site 11, and the remedy selected based on those risk levels, had accounted for the risks posed by the *combined* exposure to such constituents.

We believe these are significant concerns that must be addressed in the Final ROD for Site 11. This simply would require (1) clarification from the Navy that its analysis of the risk levels posed by hazardous constituents present at Site 11 took into account the potential risks posed by combined exposure to these constituents and (2) a commitment from the Navy that the risk levels posed by any hazardous constituents left in place at Site 11 either do not presently or will not after remediation exceed 1.0×10^{-6} for carcinogens or 1.0 for non-carcinogens.

With these clarifications and additions, we would support finalizing the ROD for Site 11.

Thank you for updating me on the above issue. I look forward to working with you on this and other issues concerning the cleanup efforts at the former MCAS El Toro. Should you have any questions, please feel free to call me at (714) 834-3156.

Sincerely,

Polin Modanlou
MCAS El Toro Master Development Program

cc: Dean Gould, BRAC
Alice Gimeno, DTSC

