



Department of Toxic Substances Control



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MCAS EL TORO
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Gray Davis
Governor

July 6, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
Base Realignment and Closure
P.O. Box 51718
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RESPONSES TO DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC)
COMMENTS ON THE SUMMARY REPORT, DATED MARCH 21, 2000, AND
SUMMARY REPORT ADDENDUM FOR AERIAL PHOTOGRAPH ANOMALY APHO 1,
MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

DTSC reviewed the above responses to comments and addendum dated April 11, 2000 and received by this office on April 28, 2000. The addendum was provided in response to DTSC comments on the Summary Report for APHO 1, dated March 21, 2000. APHO 1 (also referenced as Science Applications International Corporation (SAIC) 7) was identified on an aerial photograph dated December 29, 1946 and was described as stains adjacent to the aircraft parking apron at North 6th Place and K Street, and at North 4th Place and K Street.

The information in the addendum shows that much of the area associated with APHO 1 has either been removed or disturbed as part of removal of the inactive underground storage tanks from former Tank Farm 3 in September 1996. Based on information provided in the *Closure Report for Underground Storage Tank Removals at Fuel Farm #3* (American Processing Co., Inc., 1996), samples from tank excavations and stockpiles of excavated material were analyzed for hydrocarbons as diesel (United States Environmental Protection Agency (EPA) Method 8015 modified), benzene, toluene, ethylbenzene and xylenes (EPA Method 8020) and petroleum hydrocarbons (EPA Method 418.1). Tank removal and confirmation sampling activities were conducted with oversight by the Orange County Health Care Agency (OCHCA). Based on information provided in the Summary Report, OCHCA approved a status of no further action in a letter dated November 13, 1996.

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Additionally, the Summary Report recommends that comments for APHO 1 be revised in the next Base Realignment and Closure (BRAC) Business Plan update to correlate to the description provided in the SAIC *Final Report, Aerial Photograph Assessment, MCAS El Toro* as follows: "APHO 1 (SAIC 7) is described as stained areas within the former Tank Farm 3 facility adjacent to the aircraft parking apron." Based on clarification provided by the Navy, DTSC understands that these revisions are necessary to correct previous transcription errors from the SAIC Final Report to the BRAC Cleanup Plan (predecessor to the BRAC Business Plan).

After review of the responses to comments and the addendum, DTSC concurs with the proposed status of no further action and comment revisions for APHO 1. The no further action status and revised comment must be documented in the next Business Plan update.

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

Sincerely,



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