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Secretary for
Environmental
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Department of Toxic Substances Control

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MCAS EL TORO
SSIC NO. 5090.3.A



Gray Davis
Governor

May 12, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
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Dear Mr. Joyce:

COMMENTS ON TECHNICAL MEMORANDUM, AERIAL PHOTOGRAPH ANOMALIES, MARINE CORPS AIR STATION (MCAS) EI TORO

The Department of Toxic Substances Control (DTSC) has reviewed the above subject document dated April 1999. The Technical Memorandum presents summary data from the evaluation of historical aerial photographs and recommendations for the future management of more than 700 anomaly sites at MCAS El Toro. According to the memorandum, the Department of Navy (DoN) acquired and reviewed both historical Station maps and the results of investigations associated with the Installation Restoration Program (IRP) and environmental compliance program sites. The DoN then confirmed previous recommendations or developed refined recommendations based upon the most recently collected data. The DoN recommended no further action status for all the anomaly sites except five (5) Aerial Photograph Anomaly Areas. The five Anomaly Areas consist of nineteen (19) anomaly sites proposed for further evaluation.

DTSC comments are as follows:

1. *Introduction, page 1:*

The investigation of aerial photograph anomalies was initially conducted by U.S. EPA as part of the Preliminary Assessment/Site Inspection (PA/SI) to identify CERCLA sites at MCAS El Toro. An additional aerial photograph study was conducted by Science Applications International Corporation (SAIC). Since these investigations were conducted as part of the PA/SI, all aerial photograph anomalies should be considered potential CERCLA sites until sufficient investigations have been conducted. It is premature to recommend that sites be recommended for No Further Action or minimal sampling based

solely on a record review. The photograph anomalies may indicate areas where hazardous substances were spilled, released or buried prior to accurate records having been kept at the base.

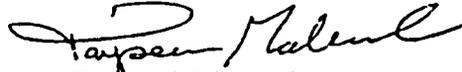
2. *Recommendations Section, page 3:* Anomaly Areas 1, 2, 4, and 5 are proposed for shallow soil sampling for petroleum hydrocarbons and volatile organic compounds; the results of field investigations are then to be submitted to the Regional Water Quality Control Board (RWQCB). This approach is not acceptable to DTSC because there is no evidence that the spills were as a result of petroleum hydrocarbon releases only. These areas should be investigated for the same suite of constituents of concern as all other Temporary Accumulation Areas and the results of investigation should be submitted to the regulatory agencies. Based on the results of analysis, the areas with petroleum contamination only can then be deferred to the RWQCB for assessment.
3. *Aerial Photograph Anomaly Area 3, page 5:* The reference to the location of Area 3 should be the northeast section of the Station not the northwest.
4. *Table 2, Proposed List of Aerial Photograph Anomalies (APHOs):* Most of the APHOs listed in the table are recommended for No Further Action (NFA) status based upon review of historical records. DTSC is of the opinion that a visual site inspection should be conducted for every anomaly database tracking location (i.e., APHO 1 through APHO 68) to check for sign of past spills or releases of hazardous constituents. The APHOs should be visually inspected, photographed, and a written evaluation report submitted to the agencies before a No Further Action (NFA) status can be agreed to by DTSC. The report should be prepared in a format similar to the Resource Conservation and Recovery Act (RCRA) Facility Assessment report conducted for the Temporary Accumulation Areas at MCAS El Toro.
5. *Exhibit 1, Table 2, SAIC Aerial Photograph Anomaly List:* The Technical Memorandum did not provide adequate explanation of the criteria/rationale used by DoN to recommend No Further Action on several anomaly sites that SAIC recommended for Further Investigations (FI). The following anomalies should be visually inspected and the reports submitted to the agencies. If a previous investigation or cleanup was conducted in the same location as an APHO, sufficient information should be provided to demonstrate that the APHO was investigated. Simply noting that investigations or cleanups were conducted adjacent to an APHO is not sufficient. Site inspections and reports should be provided for the following SAIC numbered anomalies: 117, 133, 270, 404, 405, 523, 525, 8, 66, 67, 88, 111, 112, 145, 147, 149, 157, 199, 217, 260, 284, 285, 458, 35, 68, 135, 176, 177, 246, 303, 305, 342, 348, 488, 528, 570, 58, 121, 125, 127, 163, 175, 364, 413, 452, and 219.

Also, please provide page numbers and table header for the pages following page 1.

Mr. Joseph Joyce
May 12, 1999
Page 3

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

Sincerely,



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