



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

# Department of Toxic Substances Control

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M60050\_003619  
MCAS EL TORO  
SSIC NO. 5090.3.A



Gray Davis  
Governor

January 7, 2003

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

## DRAFT STATUS UPDATE, MARINE CORPS AIR STATION EL TORO ENVIRONMENTAL CLEANUP FACT SHEET

Dear Mr. Piszkin:

The Department of Toxic Substances Control (DTSC) reviewed the referenced draft fact sheet, dated December 2002. The purpose of the fact sheet is to provide an update on the environmental cleanup activities at MCAS El Toro and to conduct a community relations program survey. Information obtained from the survey will be used for updating the MCAS El Toro Community Relations Plan.

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

1. Page 1, right-hand paragraph: Please include information to explain the difference in sites that are included in the Installation Restoration Program and those that are included in the compliance program.
2. Page 2, Operable Unit Descriptions: Please describe the use of operable units.
3. Page 2, OU-1 (Site 18): In general, the use of the terms "principal" and "regional" aquifer should be consistent with the *Proposed Plan - Groundwater Cleanup for Operable Units 1 and 2A at Marine Corps Air Station El Toro*, dated November 2001.

4. Page 2, OU-1 (Site 18), Description: The last sentence states, "Site 24 is the source of VOC contamination in soil that later migrated to the groundwater, see

*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).*

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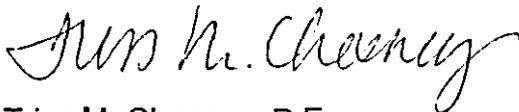
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OU-2A (Site 24) below." It may be helpful to clarify that VOC contamination in soil and shallow groundwater at Site 24 later migrated to the principal aquifer (Site 18).

5. Page 2, OU-1 (Site 18), Status: "Groundwater which is present in the shallow aquifer at Site 24 will be extracted by the Marine Corps/Navy and treated [at the IDP] or disposed of under a separate contract with OCWD/IRWD." should be moved to the status for OU-2A (Site 24).
6. Page 3, OU-2 (Site 24), Status: For clarity, the end of this section should include details about the groundwater cleanup (extraction with treatment at the IDP or disposal) rather than simply referring to the groundwater cleanup for OU-1. However, it is reasonable to refer the reader to OU-1 regarding the IDP and associated agreement since both apply to Sites 18 and 24.
7. Page 4, OU-2B (Site 2 and Site 17), Status: Please clarify that the interim ROD did not include the remedial action for groundwater at Site 2. Additionally, according to the Interim ROD, construction of the landfill cap will not proceed until after the radiological survey/sampling data have been evaluated to determine the potential impact on the remedial design.

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

Sincerely,



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

Enclosure

cc: Ms. Nicole Moutoux  
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**SENSITIVE RECORD**

**PORTIONS OF THIS RECORD ARE CONSIDERED SENSITIVE  
AND ARE NOT AVAILABLE FOR PUBLIC VIEWING**

**ADDRESS OF PRIVATE CITIZEN**

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**SENSITIVE**

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**SENSITIVE**



Mr. Andy Piszkin  
January 7, 2003  
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cc: Ms. Kim Foreman  
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Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

## Department of Toxic Substances Control

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Edwin F. Lowry, Director  
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Gray Davis  
Governor

TO: Triss Chesney  
Remedial Project Manager

FROM: Kimberly Foreman **KAF**  
Public Participation Specialist

DATE: January 6, 2003

SUBJECT: **COMMENTS ON DRAFT FACT SHEET FOR MCAS EL TORO**

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I have reviewed the draft fact sheet dated December 2002 and have the following comments.

**General Comment.** The fact sheet is written almost entirely in passive voice, e.g., "An RI was conducted," or "the Proposed Plan was issued." This has the effect of weakening the document overall. It also makes it unclear exactly who is doing what. I strongly recommend choosing a term for the people taking the action, and using it throughout, changing the statements to active voice wherever possible. The paragraph that describes the BCT could be expanded to explain that the Marine Corps/Navy is conducting the cleanup, with contractors performing the work, and that the work is closely coordinated with the BCT. After this explanation, you could refer to the entire group as the "cleanup team," and use that term throughout the document to state who is taking the actions described. If this term is not acceptable, then "The Marine Corps/Navy" or something similar could be used, once it has been explained that this includes, by default, the entire BCT. In some instances you could even use the term "we" as appropriate. This takes ownership of the process and makes everything more direct.

Changing the text to active voice would take very little rewriting, and would result in a far stronger, clearer, and more effective document. I think it would be well received by the RAB and the general public, and would get more response to the fact sheet and survey than we have gotten in the past.

1. Type Size. The type size for the body of the text is too small to be easily read. It may be a problem especially for older people. Since there is not enough text that can be cut to make room for a larger font, my suggestion is to take the half-page map on Page 2, expand it to a full page, and make it a standalone insert. This would free up

enough space to make the type size larger, at least as large as the type used for the Tustin fact sheet. Expanding the size of the map would also make the figure more useful, and having it loose would make it easy for people to use as a quick reference at meetings and on tours.

2. On the first page the discussion should be limited to the IRP sites, and not include the LOCs. Trying to discuss both the IRP sites and LOCs within the introduction makes the text very confusing, as well as cluttered with numbers and letters. Also, the LOCs are never really explained and are not discussed further. I recommend either deleting all references to them, or adding a very brief mention at the end of the introductory text (on Page 2). This brief description could include the sentence from the current second paragraph that starts with "The majority of LOCs are managed...."

3. Page 1, first paragraph, lines 10-11. "...reflect the cleanup process" would be clearer if changed to "comply with the cleanup process."

4. Page 1, second paragraph, lines 12-13. I recommend taking out the list of actual sites. This doesn't add useful information at this point since the IRP sites have not yet been described.

5. Page 2, first sentence. This sentence would be clearer (and would reflect the change to a standalone map) if it simply stated, "The map provided in this fact sheet shows the locations of all 24 IRP sites."

6. Page 2, second paragraph. The sentence describing the BCT is too long and unwieldy. It would be better to end it after "(Cal/EPA)," then start a new sentence with "Cal/EPA is represented by." Please add "the" in front of DTSC's spelled-out name.

7. Page 2, Operable Unit Descriptions. This section could be shortened to "This fact sheet describes the status of the environmental investigations and cleanup activities at each Operable Unit."

8. Page 2, OU-1 description. Please explain briefly what the relationship is between Sites 18 and 24. This isn't clear in the current text.

9. Page 2, OU-1 description, fourth line. "...chemicals and solvents" should be "chemicals from solvents."

10. Page 2, OU-1 description, Status. The second sentence in this section is unclear. Why were modifications to the alternatives evaluated? Please reword to be more simple and direct.

11. Page 2, OU-1 description, Status, last sentence. "Groundwater which is present in the shallow aquifer" should be shortened to "Groundwater in the shallow aquifer."

12. Page 3, OU-2A description. "Hangers" should be "hangars." Also, please delete

the reference to the building numbers at the end of the first paragraph. It doesn't add useful information since they aren't referred to again.

13. Page 3, OU-2A description, Status. These descriptions don't need to include the internal working schedules for the documents. I recommend deleting the first sentence and starting the next one with "In 1996 the RI determined...."

14. Page 3, OU-2A description, Status, line 3. "...and also migrated" would be clearer if changed to "...and had migrated...."

15. Page 3, OU-2A description, Status, line 4. Please change "The FS also evaluated" to "The FS evaluated...."

16. Page 3, OU-2A description, Status, line 12. "...trapping" would be better stated as "...that traps...."

17. Page 3, OU-2A description, last line. I recommend adding a brief sentence that again explains the relationship with Site 18.

18. Page 3, OU-2B description, lines 5 and 12. "Disposed" should be "disposed of" in both cases. The word "disposed" by itself has a different meaning and is incorrect in this context.

19. Page 3, BCT description (boxed text). This description implies that since the BCT was formed when El Toro was announced for closure, there was no IRP before then. Please clarify that the BCT evolved from the cleanup team already actively working on the IRP before the BRAC announcement. Also, this section could be shortened and simplified by not listing all the types of documents the BCT reviews. It suffices to say that the BCT reviews and coordinates on all steps of the investigation, planning, and cleanup process.

20. Page 4, first line. Please briefly state what "presumptive remedy" mean, or else use a clearer word or phrase. This term may not be clear to people unfamiliar with the IRP.

21. Page 4, OU-2C description, line 12. Please explain briefly what "Anomaly Area" means and how it is different from an IRP site, or else delete the specific term and say simply "an area of" (or whatever).

22. Page 7, Mailing List Coupon. Many people have become so used to the convenience of email that they no longer are willing to fill out a hard copy and put it in the mail. Please add an option of emailing this same information. This should help get a bigger response.

23. Page 7, Radiological investigation description, first paragraph. To shorten and simplify, I recommend deleting the sentence "A Radiological Survey Plan for

conducting...." Then change the first word in the next sentence from "The" to "A."  
Finally, combine this sentence with the first sentence of the next paragraph to read "A radiological survey of 14 outside areas and 9 buildings at the Station was conducted in 2001." (Or put it in active voice, as recommended in my first comment.)

24. Page 8, Where to Get More Information. One recommendation is to retitile this as "Who to Contact for More Information." This will make it more specific and distinguish it from the description of the IR/AR.

25. Page 8, Where to Get More Information. Please change my name and phone number to Tim Chauvel, 484-5487.

26. Survey Form. When this survey was discussed at the Tustin RAB, several people said they would have completed the survey if they could have used email. Please give an option for people to email this same information.

These are all my comments. Thank you for the opportunity to review this draft document.