

ADMIN RECORD  
BT



April 1, 1997

M60050\_004164  
MCAS EL TORO  
SSIC NO. 5090.3.A



Department of  
Toxic Substances  
Control

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Pete Wilson  
Governor

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Protection

**COMMENTS ON DRAFT FINAL PHASE II FEASIBILITY STUDY REPORT:  
COMMUNICATION STATION LANDFILL, SITE 17, OPERABLE UNIT 2B,  
MARINE CORPS AIR STATION (MCAS) EL TORO**

Dear Mr. Joyce:

The California Environmental Protection Agency (Cal/EPA) has completed the review of the above subject document dated February 1997 and received by us on March 5, 1997. The report, prepared by Bechtel National, Inc., presents the results of a Feasibility Study (FS) conducted to identify and evaluate potential remedial action alternatives at Site 17, the Communication Station Landfill. Site 17 is one of two sites in Operable Unit 2B for the MCAS El Toro.

Based on our review of the response to comments and the revised FS, we find the document still deficient and does not provide adequate responses to Cal/EPA comments dated November 4, 1996. This letter is to transmit the enclosed Department of Toxic Substances Control (DTSC) and California Integrated Waste Management Board (CIWMB) comments dated April 1, 1997.

The Santa Ana Regional Water Quality Control Board has no comments on the document. Please provide revisions to the report addressing DTSC's and CIWMB's comments by May 5, 1997.

If you have any questions, please call me at (562) 590-4891.

Sincerely,

Tayseer Mahmoud  
Remedial Project Manager  
Office of Military Facilities  
Southern California Operations

Enclosures

cc: See Next Page



*Mr. Joseph Joyce*  
*April 1, 1997*  
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**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**  
**Comments on**  
**Draft Final Phase II Feasibility Study Report (FS) for Site 17, OU-2B**  
**Marine Corps Air Station-El Toro**  
**Dated February 1997**

The list of comments below were prepared by Mr. Tayseer Mahmoud, Remedial Project Manager for Department of Toxic Substances Control (DTSC) and Mr. Ronald Okuda, Environment Assessment and Reuse Specialist for DTSC. Comments prepared by Ms. Sherrill Beard, Certified Hydrogeologist from DTSC's Geological Services Unit is attached. The comments are directed to the Department of Navy and their consultants.

**GENERAL COMMENTS:**

The Department does not agree that restrictions on land and groundwater use "may be negotiated during the BRAC transfer." If the restrictions are developed as a component of the engineering control(s) to ensure the remedy is protective, the institutional control(s) should not be negotiable items. This especially applies to landfill cover remedies which are basically cap and monitor systems as opposed to an active remediation technology. The institutional controls should be evaluated with the same care as the engineering controls and a discussion of the alternatives should describe which institutional controls are appropriate for each alternative.

The MCAS El Toro Local Redevelopment Authority (LRA) approved a Community Reuse Plan for the base in December 1996. As stated in the Draft Final FS Executive Summary, the LRA has recommended that the DoD grant the Department of Interior's Habitat Reserve request. Site 17 is located within the area of the Habitat Reserve request. Although the DoD has not yet completed the federal screening process, it is fair to assume that the area (including Site 17) will be transferred to the Department of Interior. Since the "owner" of the property will remain the United States Government, deed restrictions are probably not the best institutional control to use in this case. However, the Navy can choose to prepare a land use covenant (deed restrictions) in case the federal screening isn't approved or for the Department of Interior to use if they decide to sell the land in the future.

The site has already been fenced and other institutional controls will be necessary to protect the remedy, monitoring wells, and provide for operation and maintenance. Therefore, a discussion of the institutional controls should also describe the type of agreement (e.g., Who will be responsible for maintaining the landfill cover, perform O&M, etc.) that will be "negotiated" with the Department of Interior (as the new tenant) to ensure that the remedy (engineering and institutional controls) remains protective to human health and the environment.

**SPECIFIC COMMENTS/NAVY'S RESPONSE TO DTSC COMMENTS:**

1. See attached memorandum dated March 24, 1997, prepared by Ms. Sherrill Beard, Certified Hydrogeologist from DTSC's Geological Services Unit.

**OTHER COMMENTS:**

1. We could not find, in the tables or sections of Appendix A, responses to DTSC's submitted ARARS, Orange County Health Care Agency, and Orange County Fire Department ARARS. DTSC's submitted ARARS include Title 22, CCR 66264.14(a), 66264.19(a, c), 66264.51, 66264.52(b), 66264.97 to 100, and 66264.117(c, d, f).

2. Section A3.1, location Specific ARARS, page A3-1

Having a section similar to A3-1 on page A3-1 that lists the citations examined would be good for the other sections such as Chemical and Action Specific ARARS.

3. APPENDIX A, Action-Specific ARARS

The draft final FS has deleted the discussion of Land Use Restrictions from Appendix A (formerly Sections A4.1, A4.1.1, A4.1.2, A4.5 and A4.5.1) without providing the rationale. Amendment of the base master plan to restrict future uses at Site 17 Should be a component of all alternatives being considered.

4. Table A4-1, page A4-5

Please list the appropriate sections listed under 66264.111© that are relevant ARARS. Some subsections of 66264.111 may not be appropriate.