

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

245 West Broadway, Suite 425
Orange Beach, CA 90802-4444
590-4858

February 16, 1996

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

**COMMENTS ON DRAFT INTERIM ACTION OPERABLE UNIT 1 FEASIBILITY STUDY PROPOSED PLAN,
MARINE CORPS AIR STATION (MCAS) EL TORO**

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated December 1995. The document describes the alternatives to clean up ground water contamination in the principal aquifer at MCAS El Toro and presents the U.S. Marine Corps/Navy's preferred alternative. DTSC supports Alternative 6A as the preferred alternative. As Orange County Water District plans to convert agricultural wells in the area of concern into drinking water wells, we believe that Alternative 2A may not be an acceptable contingency alternative. Moreover, Alternative 2A may not be a cost effective approach.

Enclosed are additional comments on the Proposed Plan from Ms. Marsha Mingay, our Public Participation Specialist. Please review and consider these comments carefully as the final document must be presentable to the public for review, consideration, and feedback to the base.

If you have any questions, please contact me at (310) 590-4891.

Sincerely,

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

Enclosure

cc: See next page.

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cc: Ms. Bonnie Arthur
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San Francisco, California 94105-3901

Mr. Lawrence Vitale
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
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Mr. William R. Mills Jr.
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P.O. Box 8300
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Ms. Marsha Mingay
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Department of Toxic Substances Control
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Mr. Vish Parpiani
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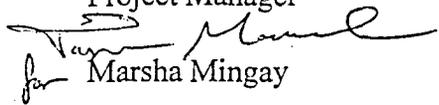
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
245 West Broadway, Suite 425
Long Beach, CA 90802-4444



MEMORANDUM

TO: Tayseer Mahmoud
Project Manager

FROM: 
Marsha Mingay

DATE: February 7, 1996

SUBJECT: COMMENTS ON THE INTERIM ACTION FEASIBILITY STUDY
PROPOSED PLAN FOR OU 1

Public Participation has reviewed the above referenced document and submits the following comments.

The document contains all required information, however changes in the wording, use of added tables/matrices, deletion of repetitive information and a more prominent text box regarding the public participation opportunities will lead to a more reader friendly document for the general public. This is important since EPA's guidelines state that the Proposed Plan is to be written "in a clear and concise style and use illustrations and figures where appropriate to better summarize the information in the RI/FS." (EPA, Community Relations in Superfund: A Handbook, page 34).

Page 1 Text Box

Since the Proposed Plan stage of the CERCLA process is intended to inform the public and provide them with the opportunity to become involved, a more prominent public comment/meeting text box is appropriate. By utilizing a small space on the front page of the Proposed Plan, the reader could assume that you are minimizing the importance of public involvement in this process. Therefore, please review and incorporate the style and informational contents of the the attached examples.

Table of Contents

Incorporate the article entitled, "How Much Will Clean Up Cost?"



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What Is the Purpose of the Proposed Plan?

Page 2, last paragraph in article -

After the first sentence in this paragraph, add the following, "The public is encouraged to review and submit comments on all the alternatives considered."

What is the Problem at MCAS El Toro?

Page 2, second paragraph -

The information presented may increase fear due to a lack of information regarding the relationship between toxicity, exposure pathways and health risks. Suggest the incorporation of information regarding exposure pathways either in this article, or in a separate article. If a separate article is written, utilize a parathetical statement to tie the information together.

Page 2, fourth paragraph -

Since this article provides a verbal picture of the situation at MCAS El Toro, combine the information presented with similar information found on page 5, under "Source Area". The following is suggested, "The sources of the regional groundwater contamination are concentrated in the southwestern portion of MCAS El Toro. Although the exact source location areas are still being determined, the presence of VOCs in the area are consistent with previous MCAS El Toro activities. These activities included hazardous chemical spills or releases into the soils. Overtime, the contamination seeped through the soils and into the groundwater."

What is an Interim Action?

Replace the first sentence with part of the sentence currently appearing in the article, "Why do we Need an Interim Remedial Action?" The paragraph in the article, "What is an Interim Action" would begin with the sentence, "The U.S. Marine Corps/Navy has determined that the Phase I data, combined with historical data, are sufficient to proceed with the selection and implementation of a remedy for regional VOC contamination."

To streamline information contained within the document, delete the following from this article.

"because there are groundwater problems in other areas of the Station that will be addressed separately." (quote can be found at the end of the first paragraph)

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“The U.S. Marine Corps/Navy’s goal is to take remedial action to capture and remove contaminants from groundwater and to prevent them from spreading further. (Quote is located on page 3, above the bullets elaborating on this information).

What is Groundwater?

Delete the following sentence as it could be interpreted as condescending, “Groundwater is an important resource. It provides water from many purposes, including irrigation and domestic uses.”

What is the History of MCAS El Toro?

Since we know that hazardous substances were used at MCAS El Toro and that they are a source of contamination, be more specific in the second paragraph. The following is suggested, “... Many potentially hazardous substances were used (such as ...) and are the source of groundwater contamination. These substances were released into the environment ...”

Include a definition for “bias for action”. This is not a commonly known EPA policy (see 3rd paragraph of article).

What Studies Have Been Done?

The studies listed have all led to this proposed plan, therefore, an introductory paragraph which tie the studies together would provide the reader with an understanding of why these studies took place. (Note that the first paragraph in, “What are the contaminants ...” begins to achieve this objective.)

U.S. Marine Corps/Navy Monitoring of VOCs

To clearly present the information, reword the following sentences to read, “The U.S. Marine Corps/Navy analyzed samples of groundwater and found that the shallow groundwater contained VOCs. These findings suggested that the contamination of the regional groundwater was caused by Marine Corps activities.”

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What Are the Contaminants and ...

As stated in the comment for "What Studies Have Been Done?", this information should be used to introduce the studies which have been conducted. Since it is suggested that the information be moved, this section could be deleted.

Types of Contaminants Found

This information is best presented in table format, as you have done in Table 1. Therefore, the article can be deleted.

Source Areas of VOCs

As indicated in the comment for "What is the Problem ...", this information should be incorporated into that article.

Contamination Levels, Extent, and Migration

The information presented in paragraphs two through four, would be clarified immensely if it was presented in a matrix versus written paragraph form. Additional information also needs to be provided which will explain why data is not presented for each area of concern (e.g., no information was presented for TCE, on-station, in the deep aquifer). A suggested table format is attached as Example 2.

The fifth paragraph in this article is a description of the plume and its relationship to the MCLs. We suggest that an article heading be utilized to highlight this important information.

Is There Any Risk to Human Health?

When discussing risk, it is important to provide the reader with the bottom line conclusion first, and then go into the specifics. Following that format, move the second to the last paragraph in this article to the second paragraph position. This will provide the reader with the good news first.

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The use of bullets in this article is confusing. We suggest the use of subheadings, to group the information presented. For example, the first bullet is generic information regarding excess lifetime cancer risk and the subsequent bullet provides specific information regarding excess lifetime cancer risk in relationship to MCAS El Toro. These first two bullets are vastly different than the third which talks about the potential for non-cancer effects. The use of subheadings will alert the reader that the following information is a separate type of assessment. Additionally, to follow the format of providing generic information and then specific information, break the third bullet into two paragraphs.

The wording in this article is confusing. The uneducated health risk assessment reader might interpret the information as:

4 wells exceed lifetime cancer risk value of one in 10,000

47 wells, exceed the one in 1 million risk level

8 wells exceeds a non cancer hazard index of 1.0 for max. exposure scenario

5 wells exceed a non cancer hazard index of 1.0 for average exposure scenario

Individuals with this understanding, will want to know which wells are these? Where are they located? To avoid this misinterpretation, please clarify the information.

Why Do We Need an Interim Remedial Action?

Information presented is mostly contained within the article, "What is an Interim Action". To streamline the document, delete this article.

What Will the Interim Action Entail?

Information presented is contained elsewhere in the document and therefore can be deleted.

What Are the U.S. Marine Corps/Navy's Cleanup Standards?

The second paragraph mentions that the contamination must be cleaned up to levels with a Hazard Index less than 1. Include a sentence which states what the hazard index at MCAS El Toro is currently.

The third paragraph, last sentence provides important information. Please provide additional information regarding the level of contamination that can remain in the groundwater after the remedial action is complete.

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What Are the U.S. Marine Corps/Navy's Cleanup Alternatives?

For some of the alternatives, you have provided information on whether the alternative will meet the objectives or not. Please include this type of information for **all** of the alternatives listed since it allows the reader to understand your decision process.

In the description for Alternative 4B, the term "safety margin" is used. Please either reword, or define its meaning to avoid misinterpretation.

How Were the Cleanup Alternatives Evaluated?

The article is confusing because it does not contain specifics or examples. What were the alternatives that were eliminated in the "initial screening"?

Change the last sentences in this paragraph to read, "These alternatives were evaluated using the nine criteria summarized in Table 3. Based upon that evaluation, the U.S. Marine Corp/Navy has identified 6A and 2A as their preferred alternative."

How Do the Cleanup Alternatives Compare?

This article is extremely confusing and would be best presented to the reader in a matrix format. Please see the example fact sheet provided.

Table on page 13

To assist the reader in understanding the information presented, define "18 ET1" in the table.

Evaluation of Preferred Alternative by EPA Criteria

Provide information on how the "alternatives would remain protective over the long term."

The article states, "The time period required for compliance would be significant, because the volume of VOC-contaminated groundwater is large." Provide the anticipated time period so that the reader can understand your conclusion.

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The article states, "Both Alternatives 6A and 2A would require significant periods of time to meet the remedial objectives for clean up of the groundwater." Provide the anticipated time period so that the reader can understand your conclusion.

Provide information regarding the 4 percent discount rate.

Eliminate the brackets surrounding paragraph for "State Acceptance".

How Will the U.S. Marine Corps/Navy Decide ...

Spell out the acronym for IDP

Glossary

Incorporate the Water Board's Resolution 68-16 since it is relatively unknown to the general public and is used frequently in the document.

Page 16, text inset box

Insert "Interim Action" before "Remedial Investigation."

Where to Get More Information

Add DTSC Public Participation Specialist as a point of contact. Information to be included is:

Ms. Marsha Mingay
Public Participation Specialist
State of California
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, CA 90802
(310) 590-4881

Mr. Tayseer Mahmoud

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cc: Claire Best, Supervisor
Public Participation Unit
Office of Military Facilities

Sherrill Beard
Geology Unit
Office of Military Facilities

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