

Department of Toxic Substances Control

Edwin F. Lowry, Director
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Governor

Winston H. Hickox
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Protection

May 5, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
AC/S, Environmental (1AU), BRAC Building #899
P. O. Box 95001
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Dear Mr. Joyce:

COMMENTS ON TECHNICAL MEMORANDUM, SUMMARY OF RECORD SEARCH RESULTS FOR SUSPECTED THIRTEEN (13) TEMPORARY ACCUMULATION AREAS (TAAs), MARINE CORPS AIR STATION (MCAS) EI TORO

The Department of Toxic Substances Control (DTSC) has reviewed the above subject document dated February 1999 and received by us on March 9, 1999. The following TAA were included in the Technical Memorandum: TAAs: TAA 114, TAA 242, TAA 298, TAA 317, TAA 357, TAA 386, TAA 398, TAA 442, TAA 445, TAA 447, TAA 456, TAA 534, and TAA 602. These TAAs were identified as Solid Waste Management Units in the Final Resource Conservation and Recovery Act (RCRA) Facility Assessment. The Technical Memorandum provides the supporting documentation for the deletion of the sites from the Base Realignment and Closure Cleanup Plan (BCP) for MCAS El Toro. The information provided includes historical records and current environmental program management plans and reports, and site inspections reports in support of the determination that the sites do not exist or that they were incorrectly designated as Environmental Locations of Concern (LOCs).

DTSC comments are as follows:

1. Some sites did not have adequate information to support deletion from the BCP; the deletion is solely based on the fact that the Station's Hazardous Materials/Waste Management Plan (HMWMP) does not identify the sites being listed as hazardous waste storage facilities or accumulation points for storage of hazardous waste. A copy of the excerpt from the HMWMP, listing the accumulation points and hazardous materials storage areas, was provided in the document as Attachment C. However, Attachment C does not list the building numbers for all the accumulation points (a 3-page long document). For TAA 442, OHM Remediation's (OHM) site visit and recommendations indicated that Building 441 was mistakenly identified as TAA 442, but there is only one hazardous waste storage area (TAA 441) that exists at Building 441. DTSC reviewed

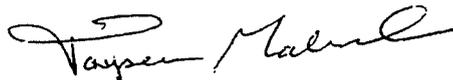
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Attachment C, but we were unable to find Building 441 on the list. This suggests that the HMWMP may not be accurate or may not have been updated as new storage areas were being used. Please tell us why you feel that the HMWMP is accurate, and resubmit a comprehensive listing of the HMWMP including the building's numbers.

2. A clarification is needed regarding TAA 398 to explain conflicting site inspection reports. Site inspections were conducted by Jacobs Engineering Group (JEG) in 1991, Bechtel National Inc. (BNI) in 1995, and OHM in 1997 and 1999. JEG identified TAA 398 south of Building 698 which consisted of a covered 20 x 25 feet concrete pad with berm and sump. BNI visited Building 398 and did not observe a hazardous waste storage area "inside or outside the building." OHM visited Building 372 and did not find evidence of a hazardous waste storage area. The Technical Memorandum needs to reconcile these conflicting reports and determine whether these site inspections were actually conducted at the same location.

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

Sincerely,



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