



# Department of Toxic Substances Control

M60050.000104  
MCAS EL TORO  
SSIC #5090.3



Edwin F. Lowry, Director  
5796 Corporate Avenue  
Cypress, California 90630

Winston H. Hickox  
Secretary for  
Environmental  
Protection

Gray Davis  
Governor

August 2, 1999

Mr. Joseph Joyce  
BRAC Environmental Coordinator  
U.S. Marine Corps Air Station - El Toro  
P. O. Box 51718  
Irvine, California 92619-1718

## COMMENTS ON DRAFT RECORD OF DECISION (ROD) FOR OPERABLE UNIT (OU) - 3A - SITES 8, 11, AND 12, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Joyce:

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated June 1999 and the Responsiveness Summary (RS) dated July 20, 1999. The draft ROD presents the selected remedial action for soil contamination at Site 8, Defense Utilization and Marketing Office Storage Area, Site 11, Transformer Storage Area, and Site 12, Sludge-Drying Beds. DTSC comments are as follows:

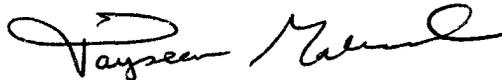
1. Description of the Remedy, page 1 & 2 - The ROD states that the Marine Corps's preferred remedy for the subject sites involves excavating the contaminated soil and recycling soil as foundation material for landfill caps at Site 2 & 17. However, based on the RS the excavated contaminated soil will be disposed at an appropriate off-Station facility. Please revise the description of the remedy accordingly.
2. Section 5.1, Summary of Site Characteristics, Site 8 - The regulatory agencies received copies the draft Historical Radiological Assessment (HRA) dated May 1999. The HRA proposes further investigation/radiological survey of Site 8. Please document, in this ROD, the recommendations of the HRA and how the conclusions and the outcome of the field work will be documented.
3. Section 5.3, Summary of Site Characteristics, Site 12 - Table 5-1 of the HRA mentions that it is possible that radium paint room waste could have been disposed of into the industrial wastewater system through an independent sewer system installed to collect metal plating waste. Therefore, there is a potential for radiological contamination at Site 12, the Sludge Drying Beds. Please address the concern regarding radioactivity at Site 12 and whether or not you plan to conduct further investigation/radiological survey of Site 12. If no investigation is planned, please submit the reason(s) and your justification.

Mr. Joseph Joyce  
August 2, 1999  
Page 2

4. Section 6, Summary of Site Risks. An evaluation of the potential impacts to human health and the environment if radioactive contamination is found at Sites 8 and 12 is not included in this section. Please indicate in the ROD the mechanism that will be used to document any additional risk and how it will impact the proposed disposal options.
5. Section 7.3, Alternative 3, Excavation with Recycling of Excavated Soil at Sites 2 or 17 Landfills - Please delete reference to recycling the excavated contaminated soil at the landfill sites. Also, indicate the disposal option if radioactivity contamination is found at the sites.
6. Section 11, Documentation of Significant Changes - Please revise this section based on the comments received during the public comment period and the changes proposed for the remedy.

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

Sincerely,



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

cc: Mr. Glenn Kistner  
Remedial Project Manager  
U. S. EPA, Region IX  
Superfund Division (SFD-8-2)  
75 Hawthorne Street  
San Francisco, California 94105-3901

Ms. Patricia Hannon  
Remedial Project Manager  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, California 92501-3339

Mr. Joseph Joyce  
August 2, 1999  
Page 3

cc: Mr. Peter Janicki  
California Integrated Waste Management Board  
8800 Cal Center Drive  
Sacramento, California 95826

Mr. Steven Sharp  
County of Orange  
Environmental Health Division  
Solid Waste Local Enforcement Agency  
2009 East Edinger Avenue  
Santa Ana, California 92705

Ms. Deirdre Dement  
Department of Health Services  
Environmental Management Branch  
P.O. Box 942732  
601 N. 7<sup>th</sup> Street, Mail Stop 396  
Sacramento, California 94234

Mr. Gregory F. Hurley  
Restoration Advisory Board Co-chair  
620 Newport Center Drive, Suite 450  
Newport Beach, California 92660-8019

Ms. Polin Modanlou  
MCAS El Toro Local Redevelopment Authority  
10 Civic Center Plaza, 2<sup>nd</sup> Floor  
Santa Ana, California 92703

Mr. Tim Heironimus  
Bechtel National, Inc.  
1230 Columbia Street, Suite 400  
San Diego, California 92101-8502

Mr. Andy Piszkin  
Remedial Project Manager  
Naval Facilities Engineering Command  
Southwest Division - Code 5BME.AP  
1220 Pacific Highway  
San Diego, California 92132-5187