

M60050.00273  
MCAS EL TORO  
SSIC #5090.3

THE BASE REALIGNMENT AND CLOSURE CLEANUP  
PLAN IS ENTERED INTO DATABASE AND FILED UNDER  
ADMINISTRATIVE RECORD NO. M60050.0002392

COMMENTS BY THE TECHNICAL REVIEW COMMITTEE  
REGARDING THE BASE CLEANUP PLAN ARE ENTERED  
INTO DATABASE AND FILED UNDER ADMINISTRATIVE  
RECORD NO. M60050.000377



DEPARTMENT OF THE NAVY  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132-5190

11011  
Ser 06CC.DG/0806  
December 15, 1999

Mr. Greg Hurley  
Kutak Rock, Suite 450  
620 Newport Center Drive  
Newport Beach, CA 92660

Dear Greg:

We have received your November 2, 1999 letter, providing RAB Subcommittee comments on the March 1999 Base Realignment and Closure Cleanup Plan. It is also noted that your letter was endorsed by way of vote by the members of the RAB present at the end of the December 1, 1999 RAB meeting. Attached you will find a detailed response to your letter, in standard "response to comments" format.

Be assured that the document to be published in early 2000 will continue to be in accordance with DON guidelines for such documents. As part of the process to ensure this, you can expect a draft copy of the next Business Plan in the very near future for your and RAB review. Thank you for your involvement in this process, and please contact myself should you have any questions on this issue.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dean Gould", written in black ink.

DEAN GOULD  
Base Realignment and Closure  
Environmental Coordinator  
By direction of the Commander

Enclosure: 1. Response to Comments from the MCAS EI Toro RAB

RESPONSES TO COMMENTS FROM THE MARINE CORPS AIR STATION, EL TORO RESTORATION ADVISORY BOARD  
Subject: Updating the BRAC Closure Cleanup Plan for El Toro MCAS

PAGE 1

Comment	Response
<p><b>Comments prepared by Mr. Greg Hurley, RAB Committee Chairman dated 2 November 1999.</b></p>	
<p><b>General.</b></p> <p>The Technical Review Committee (TRC) of the El Toro Reuse Advisory Board (RAB) has reviewed the March 1999 MCAS El Toro Base Closure Cleanup Plan (BCP) submitted to the subcommittee on August 17, 1999. Based on this review, the TRC identified six issues that require additional information and/or clarification. The following information should be incorporated into the 2000 update to the BCP.</p>	<p>Comments by the RAB and the RAB Subcommittee are welcome and appreciated.</p>
<p><b>Specific Comments.</b></p> <p><b>Radionuclides.</b> The information obtained from the Historical Radiological Assessment (HRA) along with recommendations for further study of radionuclide issues should be included in the BCP. The current information about Radon and Radium should be updated to include not only a survey of buildings but also of underground water wells, disposal systems, and sludge management at the former wastewater treatment plant. The statement that "additional testing or mitigation [for Radon] is not required" (page 3-23) has shown to be short-sighted based upon information presented at the 29 September 1999 RAB meeting. It is recommended that a complete review of all potential radionuclide issues be undertaken and that specific concerns about disposal and contamination already raised regarding Radium 226, Radon 222, Strontium 90, and depleted Uranium be addressed. In addition, the issues of radiologic background concentrations need to be thoroughly reviewed. Section 6.4.1 of the BCP does not identify radionuclides as part of the</p>	<p>The BCP is intended to describe the status, management, response strategies for, and action items related to MCAS El Toro environmental restoration and compliance programs.</p> <p>The Year 2000 update will be presented as a Business Plan rather than a BRAC Cleanup Plan (BCP), in accordance with DON guidelines and BCT approval. The Business Plan will include a narrative description of the status of the programs, tabular summaries with the status of each Environmental Location of Concern as of the end of calendar year 1999, maps showing the locations of the Environmental Locations of Concern, and a schedule with the estimated completion dates for the environmental restoration and compliance program projects.</p> <p>The Business Plan will state that the Draft Final Historical Radiological Assessment (HRA) was issued during 1999. The Draft Final HRA is included in the Comprehensive Environmental</p>

RESPONSES TO COMMENTS FROM THE MARINE CORPS AIR STATION, EL TORO RESTORATION ADVISORY BOARD  
 Subject: Updating the BRAC Closure Cleanup Plan for El Toro MCAS

Comment	Response
<p>background work that was statistically analyzed. Furthermore, there is concern that a "true" background sample was not obtained because of the possible historic use of radium-226 contaminated water on the golf course. Therefore, a rationale for the distribution and statistical analysis of additional radiological samples should be included in the updated BCP.</p>	<p>Response, Compensation, and Liability Act (CERCLA) Administrative Record for the Marine Corps Air Station, El Toro. Given the purpose of the BCP, and the status of the HRA as of the date of publication of the 1999 BCP, the BCP will not restate the findings or recommendations from the HRA documentation at this time.</p> <p>The Navy is in the process of investigating the occurrences of radionuclides that exceed Maximum Contaminant Levels (MCLs) as of December 1999. A technical memorandum or report on the findings of the investigation is anticipated to be released by mid-2000, and this document will be included in the CERCLA Administrative Record.</p>
<p><b>Underground Storage Tanks.</b> The BCP indicates that a total of 400 USTs are present at MCAS El Toro (pg 3-11). Information provided to the TRC by the BRAC Environmental Coordinator in October 1999 indicates that more than 600 USTs may have been located on base. There are also discrepancies among the various agency databases (Navy, Orange County Health Care Agency, Environmental Health Division, and the Santa Ana Regional Water Quality Control Board) as to how many USTs have been closed, how many have been cleaned up, how many USTs were closed in place, and how many are currently active. These discrepancies should be resolved and a complete accounting of the tanks provided. The status of soil and groundwater testing for MtBE in the vicinity of current and former USTs is unclear. Information previously provided in RAB meetings suggest that only one tank was found to have an MtBE release. While only a small number of tanks contained motor vehicle fuel, this release rate is remarkably low compared to the oil industry average of 60% or more of USTs that have leaked MtBE. The results of the</p>	<p>The Business Plan will identify the status of each Underground Storage Tank (UST) or UST site.</p> <p>The Navy acknowledges that there may be discrepancies between the Regional Water Quality Control Board (RWQCB), Santa Ana Region data base, the Orange County Health Care Agency (OCHCA) records, and the BCP/Business Plan. This information has been brought to their attention, and information is regularly shared between the agencies. Agency responsibility in the arena was discussed at the December 1999 RAB.</p> <p>The OCHCA has oversight for tank removals, and they track these activities through their permit program. OCHCA refers some of the UST sites to the RWQCB for management.</p> <p>The RWQCB has oversight for UST sites where the tanks were removed many years ago and no or little documentation pertaining to the tank removal and confirmation sampling</p>

RESPONSES TO COMMENTS FROM THE MARINE CORPS AIR STATION, EL TORO RESTORATION ADVISORY BOARD  
Subject: Updating the BRAC Closure Cleanup Plan for El Toro MCAS

PAGE 3

Comment	Response
<p>Tiger Team assessment (pg 3-13) on the UST issue should be included in the next BCP update.</p>	<p>activities is available. The RWQCB data base includes sites where a reportable release has occurred.</p> <p>The Station's inventory indicates that approximately 23 USTs were used for gasoline storage, and MTBE is considered a potential contaminant at these sites.</p> <p>The RWQCB and OCHCA have required that soils from UST sites be analyzed for MTBE since approximately 1997, and MTBE data is available for most sites excavated or investigated in 1997 and all sites excavated or investigated after 1997.</p>
<p><b>Fuel Distribution Network On-Base.</b> The BCP provides some information about the off-site pipeline that provided fuel to the base. (See page 3-14). However, there is little information concerning the integrity of the on-base portion of the fuel distribution network. While the off-site 8-inch pipeline is under the operational control of the Defense Fuel Supply Center, the fuel in the USTs at Tank Farm 555 and the distribution system from there are the responsibility of MCAS El Toro (See pg 3-14). The BCP (pg 3-14) indicates that studies to investigate the integrity of the fuel distribution network on base have not been performed. The volume of fuel distributed by this system is large and related environmental concerns could be significant. The entire on-base fuel distribution system should be systematically surveyed to determine whether fuel leaks may have occurred. The BCP update should address the on-base fuel distribution system.</p>	<p>The Business Plan will identify that preparations for cleaning, testing, and closure of the on-Station JP-5 pipeline were initiated during 1999. The Regional Water Quality Control Board (RWQCB), Santa Ana Region will be the oversight agency for this project, and all pertinent documents will be forwarded to the RWQCB for review and concurrence.</p>
<p><b>Perchlorates.</b> The BCP does not address the presence and use of perchlorates on base. Information provided by the Navy indicates that solid-fuel rocket boosters containing perchlorates were stored and may have been used on base. Furthermore,</p>	<p>The Navy is in the process of investigating the presence of perchlorates in groundwater at IRP Site 1.</p> <p>The Business Plan will identify the investigation of perchlorates in</p>

RESPONSES TO COMMENTS FROM THE MARINE CORPS AIR STATION, EL TORO RESTORATION ADVISORY BOARD  
Subject: Updating the BRAC Closure Cleanup Plan for El Toro MCAS

PAGE 4

Comment	Response
<p>used rocket housings may have been cleaned and repacked for use on base. Perchlorates have been detected in perched groundwater at the site but the origin and distribution of perchlorates has not been adequately addressed. It is recommended that this issue be included in the next update of the BCP.</p>	<p>the groundwater at IRP Site 1 as a 1999 project.</p> <p>Additionally, the Navy has collected perchlorate data for groundwater at other sites, and this information will become available in the year 2000.</p>
<p><b>Industrial Discharges and NPDES Permit.</b> The BCP only discusses the discharges to the sanitary sewer under the Station's Industrial Wastewater Discharge Permit No. 14-1-135 (pg 3-24). The BCP does not identify when this permit was first issued nor does the BCP discuss discharge to and from industrial wastewater systems that were used prior to the issuance of the County Sanitation District permit. Historic records from the Santa Ana Regional Water Quality Control Board indicate that industrial wastewater discharges occurred under a Waste Discharge Requirement issued by the Santa Ana Regional Water Quality Control Board. These discharges routinely discharged into Agua Chinon Wash. Possible contamination from the release of industrial wastes via these historic operations should be discussed in the BCP.</p>	<p>The Navy investigated the Former Wastewater Treatment Plant (WWTP) and Former Industrial Wastewater Treatment Plant (IWTP) during the Resource Conservation and Recovery Act Facility Assessment (RFA) of Solid Waste Management Unit (SMWU) Number 90 (Former WWTP that operated during the period from approximately 1943 through 1972) and SWMU Number 265 (Abandoned Metal Plating Sewer Lines) and during the Remedial Investigation of Installation Restoration Program (IRP) Site 12 (the Sludge Drying Beds). IRP Site 12 included the Former IWTP which operated during approximately 1945 and 1946. The RFA and IRP investigations included the acquisition and review of historical data pertaining to the sanitary and industrial wastewater conveyance and treatment systems. Additionally, employee interviews were conducted in order to collect information pertaining to facility operations. The RFA and IRP documentation is included in the CERCLA Administrative Record for the Marine Corps Air Station, El Toro.</p>
<p><b>Proposed Schedule.</b> The current Master Program Schedules for MCAS El Toro contain references to specific activities regarding the production of various documents for approval, review, etc. (See Figure 5-1). The scheduled activities do not identify specific planned actions to be implemented by the NAVY to characterize or remediate contaminants. A more detailed summary of the proposed projects with identifiable milestones and time frames should be included in the BCP. The "early finish" dates need to be more realistic.</p>	<p>The schedule that has been included in the BCP has not been intended to replace the enforceable Federal Facilities Agreement (FFA) schedule which is usually revised several times per calendar year.</p> <p>The Navy plans to include a short schedule in the Business Plan that identifies the estimated completion date for all environmental restoration and compliance program response activities.</p>

RESPONSES TO COMMENTS FROM THE MARINE CORPS AIR STATION, EL TORO RESTORATION ADVISORY BOARD  
 Subject: Updating the BRAC Closure Cleanup Plan for El Toro MCAS

Comment	Response
<p>The organization of the scheduled activities by Operable Unit may be useful for the Navy, but is confusing to those outside the program. We recommend that the schedule be organized by issue, or some other manner to facilitate communication with the public.</p>	
<p><b>Summary.</b> The RAB and the Review Committee appreciate the amount of work the Navy and its subcontractor have undertaken at El Toro. It is the unanimous position of the committee that the above-identified issues must be incorporated into the year 2000 BCP update for MCAS El Toro.</p>	<p>The Navy has addressed the issues identified by the RAB in this response to comments package, and will include information as discussed. The time spent by the members of the community to participate in this program is truly appreciated.</p>

532-0783

File: areltoro

## TRANSMITTAL

Date: 22 December 1999

From: Lynn Marie Hornecker  
MCAS El Toro

*LMH*

To: **Diane Silva**  
Code 01LS.DS

Subj: Administrative Record Materials  
Marine Corps Air Station, El Toro

**Installation:** Marine Corps Air Station, El Toro

**UIC Number:** M60050

**Document Title (or subject):** Responses to Comments on the 1999 Base Realignment and Closure Cleanup Plan for Marine Corps Air Station, El Toro, California

**Author:** Dean Gould, Southwest Division, Naval Facilities Engineering Command

**Recipient:** Gregory Hurley, Restoration Advisory Board, Co-Chair

**Record Date:** 15 December 1999

**Approximate Number of Pages:** 6

**EPA Category:** 01.1

**Sites:** All IRP, UST, RFA, APHO, and Miscellaneous Sites

**Key Words:** BCP, IRP, UST, RFA, APHO, HRA

**Contract:** N/A

**CTO Number:** N/A

*{ LM on VIM 3115100 - we need  
all of the site #s. Because  
we need actual site #,  
etc in this field. }*  
*IRP sites 1-22 & 24, 25*