



January 19, 2000

Dean Gould
Base Realignment and Closure
Environmental Coordinator
Navy Facilities Engineering Command
Southwest Division – Code 05BM-DG
1220 Pacific Highway
San Diego, California 92132-5190

Subject: Marine Corps Station El Toro - Review of Draft Business Plan

Dear Mr. Gould:

Enclosed please find comments on the December 1999 draft report entitled “Base Realignment and Closure Business Plan, Marine Corps Air Station (MCAS) El Toro” (the Draft Business Plan) issued by the Department of Navy/United States Marine Corps (DON/USMC). The comments were prepared on behalf of the MCAS El Toro Master Redevelopment Program by GeoSyntec Consultants.

Please note that some of the enclosed comments address the issue of proposed future land use designations. As you know, proposed site reuse plans have been presented in detail in the December 1999 Draft Environmental Impact Report prepared by the County for MCAS El Toro (EIR 573). The land use assumptions were forwarded to your office in an electronic format on October 22, 1999 and again on December 9, 1999. We would be pleased to work with you to ensure that the Draft Business Plan presents accurate information concerning the land use designations and proposed future uses of particular MCAS El Toro locations.

We look forward to working with you on these and related issues.

Sincerely,

Michael L. Lapin, Manager
El Toro Master Development Program

Enclosure

cc: Triss Chesney, DTSC
Steve Sharp, LEA
Glenn Kistner, USEPA

Michael Wochnick, IWMB
Patricia Hannon, RWQCB



M E M O R A N D U M

TO: Polin Modanlou, MCAS El Toro Master Redevelopment Program

FROM: Bert Palmer, Ph.D., P.E., GeoSyntec Consultants

DATE: 14 January 2000

SUBJECT: **Review of Draft Base Realignment and Closure Business Plan dated December 1999**
Marine Corps Air Station, El Toro
Orange County, California

GeoSyntec Consultants (GeoSyntec) performed a preliminary review of the draft report dated December 1999 and titled "Base Realignment and Closure Business Plan, Marine Corps Air Station (MCAS), El Toro, California" (the Business Plan) issued by the Department of Navy / United States Marines Corps (DON/USMC). The Business Plan provides a summary of the status of, management and response strategies for, and action items related to the environmental restoration and compliance programs at MCAS El Toro. The Business Plan is intended to present information available as of 31 December 1999, and describes environmental locations of concern, the acceleration initiatives implemented at MCAS El Toro, and pending BRAC projects.

The Business Plan provides a useful summary of past and planned remediation and restoration activities at MCAS El Toro. However, GeoSyntec has noted in the Business Plan a number of issues that require clarification by DON/USMC. In addition, GeoSyntec has a number of questions regarding issues discussed in the business plan. Obtaining a response to these questions would help the MCAS El Toro Master Development Program (MDP) in its reuse planning efforts. The following is a list of issues and questions identified by GeoSyntec:

- The vision statement, which is shown on the "pre-cover" page of the Business Plan, states that the BRAC Cleanup Team's vision is to: "Maximize restoration and reuse by 1999." This vision statement,

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while possibly applicable to a previous draft of the Business Plan or BRAC Cleanup Plan updates, should be updated to reflect the current status of the base, the present date (Year 2000), and future milestones for base reuse. Other similar statements (see, e.g., the discussion of “partnering” at page 12) may also require revision.

- Exhibits 2 and 3 (see Business Plan at pages 5 and 6) provide information on the “location of concern” (LOC) at MCAS El Toro. (A LOC is an area of MCAS El Toro, which is potentially contaminated or is a potential source of contamination). These two exhibits indicate which of the LOCs received a “no further action” (NFA) status. It appears that there is a discrepancy between Exhibits 2 and 3 regarding the number of NFA sites for the storage tank LOCs and for the transformer LOCs. This discrepancy should be corrected and/or clarified.
- Page 7 of the Business Plan discusses the status of various LOCs. OU-2A, which is one of the LOCs, is said to include Sites 24 and 25. A status report is presented for Site 24; however, no information is given regarding Site 25. A brief status report concerning Site 25 should be added.
- A section titled “Status of Environmental Restoration Program” which starts on page 4 of the Business Plan provides a brief status report concerning investigation and remediation at the various LOCs. This section does not appear to include a discussion of recent findings, plans for future investigations, and commitments from DON/USMC to revise remedies (e.g., if radioactive material is discovered at landfill sites or other MCAS El Toro locations). (See document titled “Historical Radiological Assessment” dated November 1999, issued by DON/USMC). Discussion of the potential presence of radioactive material at MCAS El Toro and its

impact on remediation activities should be included in this section of the Business Plan.

- The status of investigation, remediation design, remediation implementation, and other similar activities is rapidly changing at MCAS El Toro. As the Business Plan represents a snapshot of such activities, it would be helpful to associate a given site status with a status date in the draft Business Plan. For example, Exhibits 2 and 3 should include a "status date." In addition, it appears that the status of some of the sites has not been updated recently. For example, Table 2 does not include reference to a draft ROD issued in March 1999 for Sites 3 and 5. Thus it appears that the summary of the status of the various sites presented in the Business Plan should be verified and updated as needed to reflect recent information and development.
- At page 7 of the Business Plan, DON/USMC states the following regarding Sites 2 and 17: "Draft Final FS reports were submitted in September 1997, and a Draft Proposed Plan was submitted to the BCT in November 1997. The Draft Proposed Plan identified the preferred remedy for the former operational landfill areas at Sites 2 and 17 - a four-foot thick single-layer soil cover, that is considered a presumptive remedy by U.S. EPA." This statement implies that EPA has identified four-foot thick single-layer soil covers as a presumptive remedy. Evaluation of available USEPA documents (such as the report titled "Presumptive Remedy for CERCLA Municipal Landfill Sites dated September 1993") regarding presumptive remedies does not suggest that a four-foot thick single-layer soil cover is a presumptive remedy. Therefore, this statement should be revised by DON/USMC. A similar revision should be made to DON/USMC's discussion of presumptive remedies at page 8 of the Business Plan.

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- Proposed site reuse plans for some MCAS El Toro locations have changed in the past year. The Business Plan should be updated to reflect the revised proposed land uses as described in the Environmental Impact Report (EIR) published by the MDP in December 1999. An electronic copy of the MDP's proposed land uses was forwarded to your office on October 22, 1999 and again on December 9, 1999.
- At page 11 of the Business Plan, DON/USMC states the following: "Since uncontaminated areas do not coincide with the zone designations based on current land use, the BCT and the LRA will work together to determine how to transfer these properties expeditiously." The meaning of this sentence is unclear (e.g., as to the definition of zones and as to the expeditious property transfer process). It would be helpful to revise this sentence to clarify DON/USMC's intent.
- Table 2 includes a summary of the results of a risk assessment for Sites 2, 3, 5, 17, and 24. It would be useful to clarify whether the risk assessment results presented in Table 2 are for pre-remediation or for post-remediation conditions. In addition, for completeness and consistency, Table 2 should also be revised to include the results of other risk assessments conducted by DON/USMC for other sites at MCAS El Toro (such as risk assessment performed for Sites 8, 11, and 12 by DON/USMC).
- Table 1 (Sheet 2 of 2) indicates that the radiological survey is in progress. GeoSyntec reiterates its request (presented in other, earlier memoranda presented to DON/USMC that DON/USMC promptly provide to the LRA and GeoSyntec copies of the work plan for the radiological survey).

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- The reference to “early action items” in Table 1 (sheet 2 of 2) is unclear. It would be useful in the table or in relevant text of the Business Plan to clarify DON/USMC’s meaning. In addition, DON/USMC may wish to consider characterizing its efforts to “implement” opportunities as “in progress” (versus “completed”), since DON/USMC is still in the process of “identifying” opportunities.

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TRANSMITTAL

Date: 31 January 2000

From: Lynn Marie Hornecker
MCAS El Toro



To: Diane Silva
Code 01LS.DS

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Marine Corps Air Station, El Toro

Installation: Marine Corps Air Station, El Toro

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ENTERED INTO DATABASE AND FILED UNDER
ADMINISTRATIVE RECORD NO. M60050.000233

FINAL BRAC BUSINESS PLAN ENTERED INTO
DATABASE AND FILED UNDER ADMINISTRATIVE
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RESPONSE TO COMMENTS OF DRAFT BRAC BUSINESS
PLAN OF DECEMBER 99 ENTERED INTO DATABASE
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