



Draft—March 2000

## Marine Corps Proposes No Further Action at Sites 7 and 14

**T**his Proposed Plan provides an overview of the environmental investigation results for Installation Restoration Program (IRP) Operable Unit 3B Sites 7 and 14 at MCAS El Toro. It also presents the Marine Corps' proposal for no further cleanup action for soil and groundwater at these two IRP sites and a discussion of the basis for this proposal. The Proposed Plan fulfills public participation requirements under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

You are invited to review and provide comments on this Proposed Plan and other key documents during the official public comment period from TBD, 2000 to TBD, 2000. Please submit your written comments for incorporation into the Responsiveness Summary portion of the Record of Decision and for consideration in the final decision (see box below for details).

The Marine Corps' recommends that no further action is necessary at Site 7 (Units 1, 2, 3, 4, and 5) and Site 14 (Unit 1 and the catch basin) because of the low concentrations of contaminants present. Risks to human health are also within the range considered generally allowable by the U.S. Environmental Protection Agency. This recommendation is based on the results of extensive field investigations, laboratory analyses, fate-and-

transport evaluations, and a thorough assessment of potential human health risks at the two sites. Because of the lack of plant and wildlife habitats at Sites 7 and 14, an ecological risk assessment was not performed.

The extent of contamination at Sites 7 and 14 is confined to shallow soil (soil less than 10 feet below ground surface). The analytical data, site conditions, and the fate-and-transport analysis determined that contaminants present in soil (principally, semivolatile organic compounds [SVOCs], and metals) do not affect or pose a threat to groundwater. However, Sites 7 and 14 are located above a large area of groundwater contaminated with volatile organic compounds (VOCs) that originates from OU-2A, Site 24 that is present in areas both on- and off-Station. Sites 7 and 14 are still considered to be no further action sites because the need for any groundwater cleanup would be addressed as part of OU-2A, Site 24. (See the box on page 3 for a description of Operable Units at MCAS El Toro).

The MCAS El Toro Base Realignment and Closure (BRAC) Cleanup Team, made up of representatives of the Marine Corps, U.S. Environmental Protection Agency (U.S. EPA), and California Environmental Protection Agency (Cal-EPA), has carefully evaluated the remedial investigation results and concurs that no cleanup action is necessary to protect human health and the environment. The reports describing the field investigations, laboratory analyses, and risk assessments are part of the MCAS El Toro Installation Restoration Program Administrative Record file which is located at the Station. These documents are available for public review at the on-Station Administrative Record file or at Heritage Park Regional Library in Irvine (see page 7 for location information).

On July 2, 1999, operational closure of all military activities at MCAS El Toro was completed. The Marine Corps' mission at the Station was incorporated into Marine Corp Air Station Miramar operations in San Diego, California

### Public Meeting Month/day, 2000 4:30-8:30 p.m.

#### Irvine City Hall, Conference and Training Center, One Civic Center Plaza, Harvard at Alton Parkway, Irvine

You are invited to attend a public meeting to discuss the information presented in this Proposed Plan regarding the no further action recommendation at Installation Restoration Program Operable Unit 3B Sites 7 and 14 at MCAS El Toro. Marine Corps representatives will provide visual displays and information on the environmental investigations and the risk assessment conducted for these sites. You will also have the opportunity to formally comment on the recommendation for no further action at the meeting.

### Public Comment Period TBD, 2000

We encourage you to comment on this Proposed Plan and site-related documents during the 30-day public comment period. You may submit written comments by mail postmarked no later than **month/day, 2000** to: Mr. Dean Gould, Base Realignment and Closure (BRAC) Environmental Coordinator, Environmental Division, MCAS El Toro, P.O. Box 51718, Irvine, CA 92619-1718. Comments may also be sent to Mr. Gould by fax (949) 726-6586. Public comments received during this period, or in person at the public meeting, will be incorporated into the Responsiveness Summary portion of the Record of Decision and will be considered in the final decision for these sites.

# Environmental Investigation Overview

## Introduction

This Proposed Plan presents brief descriptions of the conditions at Sites 7 and 14, results of the remedial investigation and the human health risk assessment conducted for each site, and results of the evaluation process leading to the recommendation for no further action. Sites 7 and 14 were identified through a series of environmental studies and evaluations that examined past use of hazardous substances, including fuels, oils, and solvents, at MCAS El Toro. The Station mission involved the operation and maintenance of military aircraft and ground-support equipment. Historical activities on the Station included aircraft and vehicle maintenance and repair. These activities generated waste oils, solvents, paint residues, hydraulic fluid, used batteries, and other wastes.

Following the initial studies, Sites 7 and 14 were subjected to detailed field investigations and evaluations to determine the nature and extent of contamination present. The map on page 3 shows the locations of these sites and units that comprise them. Definitions of chemical and technical terms discussed in this Proposed Plan are presented in the Glossary on page 5.

## Investigation Approach

Extensive soil sampling was performed to collect data to assess environmental conditions at these sites. The investigation focused on shallow soil (from 0 to 10 feet below ground surface [bgs]) but included soil sampling to depths of 100 feet bgs. It was not necessary to collect groundwater data because soil sampling showed chemicals associated with Sites 7 and 14 were localized in the shallow soil and did not extend to groundwater. The depth to groundwater is approximately 100 feet or more at these sites.

The human-health risk values used to evaluate the need for remedial action at Sites 7 and 14 were based on the assumption of future residential use of the property for a period of 30 years. This assumption was used by the Marine Corps to provide a conservative estimate of potential future risk. For a detailed explanation of the risk assessment results for each site, please read the Human Health Risk Assessment discussion on pages 4 and 5 and refer to the summary table on page 6.

Habitat surveys were performed at Sites 7 and 14 and it was concluded no significant plant and wildlife habitats are present. Thus, it was determined that ecological risk assessments to evaluate potential effects on plants and animals from exposure to chemicals at the sites were not necessary.

A fate-and-transport analysis was conducted for the contaminants present at Sites 7 and 14. This evaluation examined potential future ways chemicals could move or migrate off the sites.

## Site Descriptions

### Site 7 – Drop Tank Drainage Area No. 2

Site 7 was used for aircraft drop tank storage and drainage from approximately 1969 to 1983. To facilitate the investiga-

tion, the site was divided into five units based on common historical activities, aerial photograph reviews, and relative locations. The five units are: 1) North Pavement Edge; 2) Old East Pavement Edge; 3) New East Pavement Edge; 4) Drainage Ditch; and 5) Open Dirt Area south of Building 296.

Aircraft drop tanks were drained and washed on a concrete apron at Units 1, 2, and 3. The mixture of residual fuel and washwater drained off the edge of the concrete apron onto the adjacent grassy areas. In addition, between 1972 and 1983 at Units 2 and 3, soil areas near the aircraft hangars (Buildings 296 and 297) are suspected to have been sprayed with lubrication oil and JP-5 jet fuel for dust control. Unit 4, a drainage ditch, conveyed surface drainage from the site to the south towards Agua Chinon Wash. The area comprising Unit 5 served as an unpaved parking lot from 1972 to 1978 and was also sprayed with lubricant oils for dust control. According to the Community Reuse Plan developed by the Orange County Local Redevelopment Agency in 1996, Site 7 is in an area designated for future use for handling airline cargo.

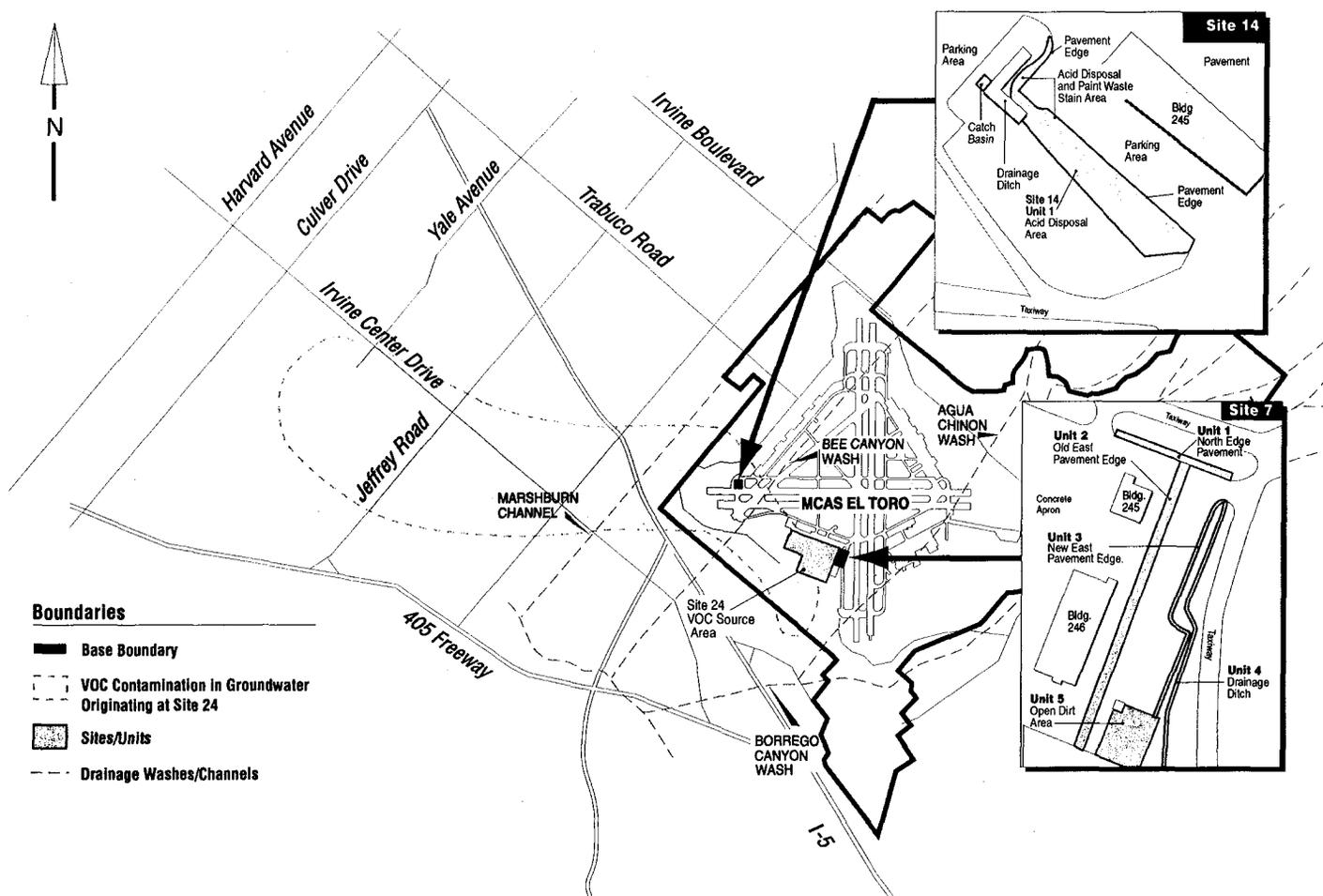
### Site 14 – Battery Acid Disposal Area

Site 14 consists of Unit 1, a battery acid disposal area associated with Building 245, and a separate catch basin. Building 245 was used as a heavy equipment maintenance shop. An asphalt parking area extends from Building 245 south to the edge of Site 14. From 1977 through 1983, fluids from batteries from facility vehicles, paints, and associated paint wastes were drained onto the unpaved ground surface beyond the edge of the parking area. Suspected contaminants included lead, other metals, waste oils, and solvents from paint products and paint strippers. When the asphalt parking area was washed down, contaminated surface water runoff drained over the edge of the pavement onto an unpaved area. This unpaved area sloped to a culvert that drains to Marshburn Channel. A separate catch basin near the battery acid disposal area was also investigated. Site 14 is designated as the future site of an airline terminal complex in accordance with the Community Reuse Plan developed by the Orange County Local Redevelopment Agency in 1996.

## Investigation Results

The remedial investigation of Sites 7 and 14 showed that low levels of contaminants were present in shallow soil at each site. Chemicals of potential concern at both Sites 7 and 14 included total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs) including polynuclear aromatic hydrocarbons (PAHs), and metals. Pesticides were also present in shallow soil throughout Site 7. At both sites, PAHs and metals are the most widely distributed classes of chemicals in shallow soil. The highest concentrations of contamination were generally limited to areas very near the surface, usually between 0 to 4 bgs. Concentrations of PAHs were reported to a depth of approximately 4 feet bgs. Except for metals, these chemicals generally diminished to trace concentrations at depths greater than 5 feet bgs.

**Figure 1 – MCAS El Toro Site Location Map, Sites 7 and 14**



The fate-and-transport analysis showed that the two potential migration pathways are air and surface water. However, it was also concluded that contaminants in the shallow soil are not readily mobilized and transported off-site. Because of the soil conditions at the site and the physical characteristics of PAHs

and metals in soil, infiltration of chemicals downward in the soil is also negligible. The analytical data, site conditions, and the fate-and-transport analysis verify that contaminants found at Sites 7 and 14 do not pose a threat to groundwater.

### **Installation Restoration Program Scope and Role of OU-3B – Sites 7 and 14**

The no further action decision for Installation Restoration Program (IRP) Sites 7 and 14 represents one component of the comprehensive environmental investigation and cleanup program under way at MCAS El Toro. Designed to protect public health and the environment, the IRP provides a structure for the Marine Corps to identify, investigate, and implement remedies for contamination that resulted from past operations and waste disposal activities. To effectively manage the overall cleanup effort, the Marine Corps organized the IRP sites into Operable Units or OUs.

- OU-1 addresses the VOC contamination in the regional groundwater that extends 3 miles west of the Station.
- OU-2A includes Site 24, the VOC Source Area, and Site 25, the Major Drainage Channels.
- OU-2B (Sites 2 and 17) and OU-2C (Sites 3 and 5) address landfill sites that contain a variety of waste materials.
- OU-3 includes the remaining IRP sites at the Station. OU-3A consists of shallow soil sites (Sites 4, 6, 9, 10, 13, 15, 19, 20, 21, 22). **OU-3B (Sites 7 and 14) is the focus of this Proposed Plan.** Sites 1 and 16 are also contained in OU-3.

For information on Proposed Plans and Records of Decisions issued by the Marine Corps for the OUs at MCAS El Toro, contact Mr. Dean Gould, BRAC Environmental Coordinator (see page 7).

# Human Health Risk Assessment

The Marine Corps conducted human health risk assessments for Sites 7 and 14 in accordance with Federal and State guidelines. An ecological risk assessment was not conducted because the results of a habitat assessment indicated an absence of plant and wildlife habitat. A human health risk assessment estimates the likelihood of health problems occurring if no cleanup action were taken at a site. To estimate the human health risks at each site the Marine Corps undertook a four-step process.

- **Step 1 – Analyze Contamination**
- **Step 2 – Estimate Exposure**
- **Step 3 – Assess Potential Health Dangers**
- **Step 4 – Characterize Site Risk**

## Identifying Chemicals of Potential Concern

In **Step 1**, the Marine Corps looked at concentrations of contaminants found at a site as well as past scientific studies on the effects these chemicals have had on people (or animals, when human studies are unavailable). The types and quantities of chemicals present in the soil at the two sites (VOCs, SVOCs, PAHs, and metals) presented in this proposed plan were investigated under the two-phase remedial investigation conducted at MCAS El Toro.

A comparison of the concentrations of the metals arsenic and manganese with concentrations of these metals at sites throughout MCAS El Toro, showed that the concentrations at Sites 7 and 14 appear to reflect the natural variation both on- and off-Station. This is based on the results of the Final Technical Memorandum on Background and Reference Levels for MCAS El Toro developed in 1996. This document discusses sampling results of geological formations for background metals nearby and at the Station. Investigators concluded that the presence of these metals in soils at Sites 7 and 14 are not a result of past activities conducted at the Station.

## Identifying Exposure Pathways

In **Step 2**, the Marine Corps considered the different ways that people might be exposed to the chemicals identified in Step 1, the concentrations that people might be exposed to, and the potential frequency and duration of exposure.

To establish the most conservative or a "worst case scenario," the Marine Corps calculated health risks assuming that residents would live at the sites for a period of 30 years and would be exposed to the chemicals identified in the soil at the sites daily. Residents were assumed to be exposed to chemicals in soil through ingestion (eating), inhalation of vapors or dust (breathing), and direct skin contact (touching).

## Estimating Health Hazards

In **Step 3**, the Marine Corps used the information from Step 2 combined with information on the toxicity of each chemical to assess potential health risks. U.S. EPA considers two types of

risk: cancer risk and non-cancer risk. The likelihood of any kind of cancer resulting from chemicals at a site is generally expressed as an upper bound probability; for example, a "1 in 10,000 chance."

In other words, for every 10,000 people that could be exposed, one extra cancer case may occur as a result of exposure to site contaminants. One additional cancer case means that one more person could get cancer from chemicals present at a site than would normally be expected to from all other causes.

For non-cancer health effects, U.S. EPA calculates a "hazard index." A hazard index of 1 or greater indicates that a lifetime of exposure to the chemical(s) may have potential for causing adverse health effects (e.g., respiratory distress) and should be evaluated further.

Calculated risk levels are an indication of potential risk assuming people would live at the sites for 30 years. These are not absolute predictions that risk will occur at a certain level. Actual human exposures to chemicals (eating, breathing, and touching) and associated risks are likely to be less than those calculated for the risk assessment. Assumptions made during the conservative risk assessment process are designed to lead to an over estimation of potential risk and provide a margin of safety to protect public health and the environment.

## Characterizing Site Risks and Results

In **Step 4**, the Marine Corps and regulatory agencies determine whether site risks are great enough to cause health prob-

### Factors Considered When Making a Risk Management Decision

Many factors were considered when making the no further action recommendation or proposal at Sites 7 and 14.

The Marine Corps and regulatory agencies (also known as the BRAC Cleanup Team or BCT) incorporated input from specialists in the field, the Restoration Advisory Board (RAB), and the public into their decision-making process.

The BCT also carefully evaluated the following site-specific conditions of each property:

- The type, location, and concentration of chemicals observed in the environment
- The potential for off-site movement or migration of chemicals
- The natural degradation of certain types of chemicals in the environment over time
- The quality of the data provided by the studies
- The planned future uses of the property
- The results from the conservative risk estimates

**Table 1: Risk Ranges to Protect Human Health**

Health Risks	Unacceptable Risks	Generally Allowable Risks	Allowable Risks
<b>Cancer</b>	More than 1 additional cancer case in a population of 10,000 (greater than $1 \times 10^{-4}$ )	1 additional cancer case in a population of 10,000 to 1 additional cancer case in a population of 1,000,000 ( $1 \times 10^{-4}$ through $1 \times 10^{-6}$ )	Less than 1 additional cancer case in a population of 1,000,000 (less than or equal to $1 \times 10^{-6}$ )
<b>Non-cancer</b>	A hazard index greater than 1 should be evaluated further.	A hazard index of 1	A hazard index less than 1

lems for people at or near the sites. The results of the three previous steps are combined, evaluated, and summarized.

The U.S. EPA provides guidelines to be used to assess the types of chemicals, degree of exposure to the chemicals, and potential toxic effects of the chemicals of concern. To assist with the risk management decision, the U.S. EPA has established the risk ranges to protect human health. These ranges are presented in Table 1 above.

The health risks calculated for Sites 7 and 14 are presented on Table 2 on page 6. This table provides cancer and non-cancer risks for each of the units at Sites 7 and 14. It also explains the risk management considerations pertaining to each site unit.

The risk assessment showed that all cancer risks were in the allowable or generally allowable risk range. Arsenic and PAHs were the main contributors to cancer risk at these sites. Non-cancer risks exceeded 1 at Site 7, Unit 1. However, the largest contributors to non-cancer risk were the naturally occurring metals manganese and arsenic. No site-related activities involved use of these metals. PAHs were present at low concen-

trations and do not have a tendency to move off-site. For these reasons, the Marine Corps has recommended all units at both sites for no further action.

**No Impact on Groundwater**

The extent of impacted soil at Sites 7 and 14 is confined to shallow soil and does not pose a threat to groundwater present approximately 100 feet below the ground surface. However, Sites 7 and 14 are located above a large plume of groundwater contaminated with volatile organic compounds (VOCs) that originates from Site 24, the VOC Source Area. The need for remedial action for groundwater associated with Site 24 is not due to activities that occurred at Sites 7 and 14. Sites 7 and 14 are still considered to be no further action sites. (See the box on page 3 for a description of Operable Units at MCAS El Toro.)

## Glossary of Chemical Terms

- **Metals found at the sites that may pose a risk to human health include arsenic and manganese. Arsenic is known to cause cancer. Manganese is a non-cancer-causing chemical that can affect the nervous system and the respiratory system. Arsenic and manganese are found in the soils native to areas on and off MCAS El Toro property and are not related to site-specific activities.**
- **Pesticides and herbicides were used to control insects and vegetation. Depending on the specific chemicals used for this purpose, they could be cancer causing or non-cancer causing.**
- **PAHs (polynuclear aromatic hydrocarbons) are a specific class or group of SVOCs, and some are suspected as cancer-causing compounds. They are commonly associated with non-combusted fuels and waste oil. At MCAS El Toro, historical activities included spraying waste oil on the ground surface to control dust. (Note: polynuclear is a term that means multi-ringed hydrocarbon.)**
- **SVOCs (semivolatile organic compounds) make up a general category of organic (carbon-containing) compounds. These compounds evaporate at a slower rate than VOCs. As with VOCs, there are known cancer-causing compounds within the category of SVOCs.**
- **TPH (total petroleum hydrocarbons) and TRPH (total recoverable petroleum hydrocarbons) are chemical components of fuels. The individual compounds that make up TPH or TRPH are evaluated for potential health effects.**
- **VOCs (volatile organic compounds) comprise another general category of organic compounds that evaporate easily at room temperature. They are commonly used for machinery and parts degreasing, paint stripping, and other industrial operations. At MCAS El Toro, historical activities have included more than 40 years of aircraft maintenance that used industrial solvents, like trichloroethene (TCE), that are categorized as VOCs. Within the category of VOCs, there are known cancer-causing compounds.**

**Table 2: Summary of Risk Results, Risk Management Considerations, and Recommendations for No Further Action**

Site/Unit	Cancer Risk Residential Scenario	Non-cancer Risk Residential Scenario	Risk Management Considerations	Recommended Actions
Site 7, Unit 1	3 additional cases in 100,000	1.4*	The risk drivers present include arsenic, manganese, and PAHs. No site related activities involved the use of arsenic and manganese. PAHs are present in low concentrations and are not mobile.	No Further Action
Site 7, Unit 3	2 additional cases in 100,000	1.0	The risk drivers present include arsenic and PAHs. No site related activities involved the use of arsenic. PAHs are present in low concentrations and are not mobile.	No Further Action
Site 7, Unit 4	2 additional cases in 1,000,000	0.5	The only risk driver present is one PAH (benzo[a]pyrene). Benzo[a]pyrene is present in low concentrations and is not mobile.	No Further Action
Site 7, Unit 5	2 additional cases in 100,000	0.55	The risk drivers present include arsenic and PAHs. No site related activities involved the use of arsenic. PAHs are present in low concentrations and are not mobile.	No Further Action
Site 14, Unit 1	4 additional cases in 100,000	0.94	The risk drivers present include arsenic and PAHs. No site related activities involved the use of arsenic. PAHs are present in low concentrations and are not mobile.	No Further Action
Site 14, Catch Basin	6 additional cases in 10,000,000	0.0088	No risk drivers were identified.	No Further Action

\*Over half of the risk index at Site 7, Unit 1 is attributed to manganese and arsenic, which are naturally occurring metals in native soil on and off MCAS El Toro property, and are not associated with past site activities.

## Multi-Agency Team Concurs on No Further Action

The Base Realignment and Closure (BRAC) Cleanup Team (BCT), composed of the Marine Corps, the U.S. EPA, and the Cal-EPA, was established when MCAS El Toro was designated for closure. The primary goals of the BCT are to protect human health and the environment, to expedite the environmental cleanup, and to coordinate the environmental investigations and cleanup at the Station.

The team also serves as the primary forum for assessing cleanup priorities and progress. The BCT obtains a consensus on issues regarding the Station's environmental activities and makes a concerted effort to integrate reuse into the cleanup decisions.

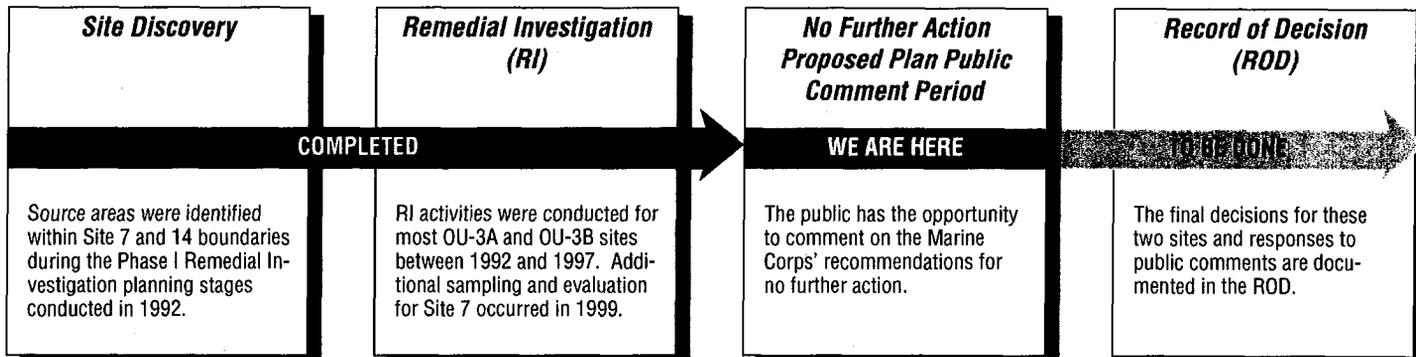
The team completed its review of the Draft Phase II Remedial Investigation Report – Attachments O and P, OU-3B Sites 7 and 14, MCAS El Toro. Discussions were held regarding the findings of the field investigations, the results of human health risk assessments, site closure plans and contamination cleanup level(s), and the recommendations presented by the Marine Corps.

Based on these discussions, the BCT concurred that the potential human health risks at the two sites presented in this Proposed Plan are within generally allowable risk ranges and no further evaluations or cleanup actions are required.

# The Next Step

Public comments on this Proposed Plan received during the period of **Month/day to Month/day, 2000** will be considered in the final environmental determination for Sites 7 and 14. Responses to comments will be addressed in a Responsiveness Summary. The Responsiveness Summary will be part of the Record of Decision, which will formally document the specific environmental determination for Sites 7 and 14. For more information on opportunities to comment on this Proposed Plan see page 1.

## MCAS El Toro Installation Restoration Program



## Where to Get More Information

If you have any questions or concerns about environmental activities at the Station, please feel free to contact any of the following project representatives:

### Mr. Dean Gould\*

BRAC Environmental Coordinator  
Base Realignment and Closure,  
Environmental Division  
MCAS El Toro  
P.O. Box 51718  
Irvine, CA 92619-1718  
(949) 726-5398 or (619) 532-0784

### Mr. Andrew Bain

Community Involvement  
Coordinator  
Superfund Division  
U.S. EPA, Region IX  
75 Hawthorne St. (SFD-3)  
San Francisco, CA 94105  
(800) 231-3075

### Ms. Claire Best

Public Participation Specialist  
Cal-EPA, Department of Toxic  
Substances Control  
Sacramento, CA 95812-0806  
(916) 324-2805  
*P.O. Box 806*

### Mr. Glenn Kistner\*

Project Manager  
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### Ms. Triss Chesney\*

Project Manager  
Cal-EPA, Department of Toxic  
Substances Control  
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Cypress, CA 90630  
(714) 484-5395

### Ms. Patricia Hannon\*

Project Manager  
Cal-EPA, Regional Water Quality  
Control Board  
3737 Main Street, Suite 500  
Riverside, CA 92501-3339  
(909) 782-4498

- **Investigation Reports and Risk Assessment Results Available for Review and Comment:** The collection of reports and historical documents used by the Marine Corps in the selection of cleanup or environmental management alternatives is the Administrative Record (AR). The AR file provides a record of decisions and actions taken by the Marine Corps for these two sites. A site-specific AR file has been compiled for Operable Unit 3B Sites 7 and 14. It includes key documents such as the Phase I and Phase II Remedial Investigation Reports.

- **Administrative Record File Location:** The complete AR file collection of documents for MCAS El Toro and an index of the file are available for review at MCAS El Toro. A site-specific AR index for Sites 7 and 14 is also available. To schedule a time to review documents at the Station during the public comment period, contact Mr. Dean Gould at (949) 726-5398 or 726-2840, or at (619) 532-0784.

- **Information Repository Location:** Copies of Remedial Investigation Reports, including the human health risk assessments, and other key documents relating to environmental activities at MCAS El Toro, are available for public review at the Information Repository at the Heritage Park Regional Library, 14361 Yale Avenue, Irvine, California 92714. The telephone number is (949) 551-7151. Current hours of operation are: Monday – Thursday 10 a.m. to 9 p.m.; Friday – Saturday 10 a.m. to 5 p.m.; and Sunday 12 p.m. to 5 p.m.

\*BRAC Cleanup Team (BCT) Member

# See Inside . . .

## Proposed Plan

No Further Action Recommended at Sites 7 and 14

### Marine Corps Air Station El Toro



#### MAILING LIST COUPON

If you would like to be on the mailing list to receive information about environmental restoration activities at MCAS El Toro, please complete the coupon and mail to: Commanding Officer, Base Realignment and Closure, Attn: Mr. Dean Gould, Base Realignment and Closure, Environmental Division, MCAS El Toro, P.O. Box 51718, Irvine, CA 92619-1718.

- Add me to the MCAS El Toro Installation Restoration Program mailing list.
- Send me information on Restoration Advisory Board membership.

Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Affiliation (optional) \_\_\_\_\_ Telephone \_\_\_\_\_

Commanding Officer  
Attn: Mr. Dean Gould  
BRAC Environmental Coordinator  
Base Realignment and Closure, Environmental Division  
MCAS El Toro  
P.O. Box 51718  
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5090  
Ser 06CC.DG/158  
March 8, 2000

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

Subj: DELIVERY OF DRAFT PROPOSED PLAN, IR SITES 7 & 14, MCAS EL TORO

Dear Ms. Hannon:

In accordance with the terms of the Federal Facilities Agreement for Marine Corps Air Station El Toro, provided for your review is the subject document. While 60 days is agreed upon as the allocated review time, your comments are welcome as soon as they may become available.

Your diligence in the review of this document is appreciated. Feel free to contact myself at (619) 532-0784 or Ms. Content Arnold at (619) 532-0790, should you have any questions.

Sincerely,

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

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

Copy to: (w/encl)  
Mr. Michael Lapin (2 copies)  
El Toro Master Development Program  
10 Civic Center Plaza, Second Floor  
Santa Ana, CA 92701

Mr. Wayne D. Lee  
Commander, Marine Corps Air Bases Western Area  
AC/S Environment  
Code 5AU  
MCAS Miramar

Environmental Program Manager  
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LTCOL Ed Gilhooley (2 copies)  
BRAC Program Manager  
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Irvine, CA 92619-1718

Mr. Gregory F. Hurley  
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March 8, 2000

Mr. Glenn Kistner  
U.S. Environmental Protection Agency  
Region IX (SFD-8-2)  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Subj: DELIVERY OF DRAFT PROPOSED PLAN, IR SITES 7 & 14, MCAS EL TORO

Dear Mr. Kistner:

In accordance with the terms of the Federal Facilities Agreement for Marine Corps Air Station El Toro, provided for your review is the subject document. While 60 days is agreed upon as the allocated review time, your comments are welcome as soon as they may become available.

Your diligence in the review of this document is appreciated. Feel free to contact myself at (619) 532-0784 or Ms. Content Arnold at (619) 532-0790, should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Dean Gould".

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

Copy to: (w/encl)  
Mr. Michael Lapin (2 copies)  
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Thurman L. Heironimus, Project Manager

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