



Department of Toxic Substances Control

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



Winston H. Hickox
Secretary for
Environmental
Protection

Gray Davis
Governor

January 24, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
BRAC Operations Office
1220 Pacific Highway
San Diego, California 92132-5190
via facsimile (619) 532-0780

DRAFT BASE REALIGNMENT AND CLOSURE (BRAC) BUSINESS PLAN MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above report dated December 1999 and received by this office on December 20, 1999. The business plan is a condensed alternative to a BRAC Cleanup Plan (BCP) that was initially issued in 1994 and updated annually through 1999. The intent of the business plan is to reduce repetitive information that was presented in the BCP and provide a concise summary of the status and strategies for the cleanup at MCAS El Toro. In general, the business plan is well organized and presents information in a clear and concise manner.

After review of the business plan, DTSC has the following comments:

1. Page 7, Operable Unit (OU) 2A: Please include the status for Site 25 (Major Drainage(s)) to indicate that the Record of Decision (ROD) for no further action for Site 25 was signed on September 30, 1997.
2. Page 7, OU-2B: Types of wastes associated with Sites 2 and 17 are described as "Suspected types of wastes include construction debris, municipal-type waste from Station operations, and oils and fuels."



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DTSC recommends modification of this description to be consistent with the "Working Draft" Final ROD for Sites 2 and 17, "Suspected types of wastes include construction debris, municipal waste, batteries, waste oils, hydraulic fluids, paint residues, transformers, and waste solvents. It is also possible that equipment painted with radium paint or other low-level radiological materials consistent with Station operations could have been disposed of into the Site 2 and 17 landfills."

3. Page 8, OU-2B (continued) first sentence: "The Draft ROD was submitted in October 1998 to the BCT for review. The Draft Final ROD is expected to be completed in the year 2000."

The referenced ROD only addresses the remedy for soil at Sites 2 and 17 and does not include the remedy for groundwater at Site 2. Based on the "Working Draft" Final ROD, remedial action for groundwater at Site 2 will be selected in a separate ROD or by means of an amendment to this ROD. Please include this distinction in the text.

4. Page 8, OU-3: "OU-3 addresses the remaining 7 sites that still require further investigation/action."

In general, it would be helpful to include a comprehensive list of the sites associated with each OU and their respective status. Please provide a list of the sites that require further investigation/action and associated status to be consistent with the information presented for the other OUs. Additionally, please list the other sites associated with OU-3 that are designated as needing no further action.

5. Page 9, Compliance Program Sites and Other Locations of Concern (LOCs): A status of non-transformer polychlorinated biphenyl (PCB) equipment is not included in the text or tables. It would be helpful to include this information to show that this issue has been addressed.
6. Page 10, Removal Actions, second paragraph: Provide a brief description (one to two sentences) of the removal actions, including volume of material removed and whether disposal was on or off-site.
7. Table 2, Site Summary, Sheet 1 of 33, IRP 2: The status for IRP 2 includes "Draft Record of Decision (ROD) submitted in October 1998." This status should be revised to reflect that the ROD submitted only addressed soil.

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8. Figure 2: The planning area and land use designations are difficult to read due to the small font size. Please increase the font size.
9. Figure 9: The red text is difficult to read as a result of the font characteristics or reproduction quality. Please change so that the text is legible.

If you have any questions, please contact me at (714) 484-5395.

Sincerely,



Triss M. Chesney, P.E.
Remedial Project Manager
Southern California Branch
Office of Military Facilities

cc: Mr. Glenn Kistner
Remedial Project Manager
U. S. Environmental Protection Agency Region IX
Superfund Division (SFD-8-2)
75 Hawthorne Street
San Francisco, California 94105-3901
facsimile (415) 744-1917

Ms. Patricia Hannon
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339
facsimile (909) 781-6288

Mr. Gregory F. Hurley
Restoration Advisory Board Co-chair
620 Newport Center Drive, Suite 450
Newport Beach, California 92660-8019
facsimile (949) 718-6708

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cc: Ms. Polin Modanlou
MCAS El Toro Local Redevelopment Authority
10 Civic Center Plaza, 2nd Floor
Santa Ana, California 92703
facsimile (714) 834-6120

TRANSMITTAL

Date: 31 January 2000

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MCAS El Toro

To: Diane Silva
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Marine Corps Air Station, El Toro

Installation: Marine Corps Air Station, El Toro

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Recipient: Dean Gould, BRAC Environmental Coordinator

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