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MCAS EL TORO
SSIC # 5090.3

City Manager's Office

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December 1, 1999

Dean Gould
BRAC Environmental Coordinator
P.O. Box 51718
Irvine, CA 92619-1718

Re: Comments on the Working Draft Final Record of Decision, Operable Unit 2B, Landfill Sites 2 and 17, Marine Corps Air Station, El Toro

Dear Mr. Gould:

Thank you for the opportunity to offer comments on the Working Draft Final Record of Decision (ROD) for Landfill Sites 2 and 17. The City of Irvine and ETRPA (El Toro Reuse Planning Authority staff) are very concerned that the Working Draft does not reflect a complete characterization and analysis of remedial actions for potential contamination on Sites 2 and 17 by radionuclides and perchlorate, both of which have been detected in the vicinity of these sites. The City and ETRPA believe further that reliance on presumptive remedies for the sites is inadequate, since EPA's documentation regarding the application of presumptive remedies to municipal landfills does not include any discussion of radionuclides contamination. Because there are a number of unresolved issues in regard to the sites, we respectfully request additional analysis prior to issuing the final ROD that will provide adequate characterization of all contaminants, including radionuclides and perchlorate. Only after adequate characterization will it be possible to determine appropriate remedial action for all contaminated areas including groundwater associated with the operable unit.

We believe that the following issues must be addressed:

1. The lack of analysis, including human health and ecological risk assessments, regarding the impacts of potential radionuclides contamination and the exclusion of VOC contaminated groundwater on the sites from the ROD indicate that the ROD is incomplete. This analysis must be completed to determine the effectiveness of the proposed remedy prior to issuance of the ROD.

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2. Staff believes that perchlorate contamination is due to the demolition and disposal of materials such as JATOs (jet-assisted take-offs) and explosive ordnance, rather fertilizer applications. As such, the City requests that the Navy include the evaluation and characterization of perchlorates in its remedial investigations and feasibility studies for the Operable Unit, especially Site 17.
3, EPA's guidance document for the use of presumptive remedies does not discuss the presence of radioactive materials. The use of presumptive remedies appears to be precluded by the presence of radionuclides on and in Site 2. As such, we reiterate our request for adequate sampling, characterization, and evaluation of the contents of the landfill at Site 2 to provide a remedy that is adequately protective of public health.
3. Findings of gross alpha radiation levels in excess of the maximum contaminant level (MCL) for drinking water upgradient from Site 17 suggests that there may be other sources for radionuclide contamination such as the Explosive Ordnance Demolition area. This needs to be evaluated and integrated into the evaluation of the adequacy of the proposed remedial actions for Sites 2 and 17.
4. To-date, the Navy has not adequately determined the disposition of the radium paint room following its demolition. The likelihood of disposal of potentially radioactive debris in base landfills, particularly Site 2, is high, suggesting the need to conduct a thorough investigation of Building 296 activities, its demolition, and the disposition of the demolition debris. We suggest that without adequate knowledge of the radium paint room disposal, there is no way to determine the adequacy of the remedial action proposed for the landfill sites.
5. In Section 7.2.1.2, Land-Use Control Restrictions, if the landfills are not fully characterized, how can restrictions on excavation and structures within 1,000 feet be enforced? Moreover, how does the Navy intend to characterize the potential for radionuclide contamination that might also affect the Alton Parkway extension and Borrego Canyon Wash improvements? These issues must be addressed prior to issuance of the ROD.
6. Section 8.10, Remedy Selection and Conclusion, identifies Alternative 3 as the most cost effective, but does not give adequate evidence that it will be sufficient for the protection of human and ecological health, especially since there is a marked absence of discussion of how the selected alternative will be affected by the presence of radionuclides and/or perchlorates.
7. The Navy's investigation of radionuclide background levels appears inadequate, given the potential for contamination in various areas of the base including the golf course (carried by potentially contaminated recycled water from the former sewage treatment plant). A careful delineation of background levels is necessary before the Navy proceeds with evaluating the significance of identified radionuclide contamination on and near Sites 2 and 17.

8. There appears to be off-base radionuclide contamination from seeps and run-off associated with Site 2. Will the Navy take responsibility for continued off-site monitoring to assure the public that the intended remedy is working even after any transfer takes place?

Thank you again for the opportunity to provide comments on the Working Draft. We look forward to the Navy's response.

Sincerely,

Peter Hersh
Assistant to the City Manager
Member, MCAS El Toro RAB

cc: Sharon Fair, DTSC, Glen Kistner, EPA, Patricia Hannon, SARWQCB