

January 7, 2000

Mr. Glenn Kistner
Project Manager
Superfund Division
U.S. EPA
75 Hawthorne St. (SFD-3)
San Francisco, CA 94105

Re: Post ROD Stakeholder Participation / MCAS El Toro

Sir:

Many parts of the former MCAS El Toro Base Closure have reached or will soon reach the Record of Decision phase. While the CERCLA process may provide no formal role for the community stakeholders after the ROD, there is certainly sufficient flexibility and precedent for such a role. As an example, Dr. C. R. Bennett still serves as the Technical Advisor to the Fullerton Hills Community Association, and in that function continues to receive all the appropriate project documentation regarding the closure of the McColl Superfund site in Fullerton. This has included a broad range of monitoring, design, and administrative documentation since the signing of the McColl ROD five years ago. His role also included participation in the regular project meetings during the design phase, too.

We propose that a similar third party stakeholder participation be instituted for the work following the current and future ROD's at El Toro. These stakeholder representatives would be on the distribution list for the same documentation that is regularly shared between the Regulatory Agencies and the DoN. Further, these representatives would be permitted to attend any of the meetings to which representatives from the Regulatory Agencies and the DoN representatives normally would meet. They would be fully authorized to comment any activities, reports or other work. They would be expected to report project progress back to the stakeholders they represent. Of course, comments, written or otherwise, are acceptable even now; that is, the public always retains the right to comment on any matter at any time.

We propose that the El Toro Base Closure is sufficiently large and complex that there should be at least two third party stakeholder representatives: a) one representative from the water purveyor stakeholders, either from the OCWD or IRWD, and b) the Community Co-Chair

or his designee. We also propose that this plan be initiated at the earliest opportunity.

Respectfully submitted,



Greg Hurley
Community Co-Chair, El Toro RAB

cc: Keith Tanaka (USEPA/Region 9)
Dean Gould (SWDiv)
Sharon Fair (CalEPA)