



## Department of Toxic Substances Control

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



Gray Davis  
Governor

Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

May 16, 2000

Mr. Dean Gould  
BRAC Environmental Coordinator  
Marine Corps Air Station El Toro  
Base Realignment and Closure  
P.O. Box 51718  
Irvine, California 92619-1718

DRAFT PROPOSED PLAN, INSTALLATION RESTORATION PROGRAM (IRP) SITES  
7 AND 14, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above document dated March 8, 2000 and received by this office on March 9, 2000. The draft Proposed Plan (PP) provides an overview of the environmental investigation results and the proposal for no further action for Site 7, the Drop Tank Drainage Area No. 2, and Site 14, the Battery Acid Disposal Area.

After review of the draft PP, DTSC has the following comments:

1. Page 5, Glossary of Chemical Terms: On Page 2, the second paragraph states, "Definitions of chemical and technical terms discussed in this Proposed Plan are presented in the Glossary on page 5."

Please revise either the text or the Glossary title so that they are consistent. Additionally, please include human health risk assessment, ecological risk assessment, and hazard index in the glossary. It is also recommended that the format of the glossary is modified so that the terms are readily identifiable. For terms included in the glossary, it may be helpful to highlight them in the text.

2. Page 6, Table 2 - Summary of Risk Results, Risk Management Considerations, and Recommendations for No Further Action: The value in the third column is the hazard index. Please incorporate this term into the column heading.

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3. Page 6, Table 2 - Summary of Risk Results, Risk Management Considerations, and Recommendations for No Further Action: The footnote states, "Over half of the risk index at Site 7, Unit 1 . . . ."

The term "risk index" is unclear. Please clarify whether this refers to cancer risk, non-cancer risk, or both.

Additional DTSC comments are enclosed. 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

Enclosure

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

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

Mr. Gregory F. Hurley  
Restoration Advisory Board Co-chair  
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cc: Ms. Polin Modanlou  
MCAS El Toro Local Redevelopment Authority  
10 Civic Center Plaza, 2<sup>nd</sup> Floor  
Santa Ana, California 92703

Mr. Steven Sharp  
Orange County Health Care Agency  
2009 East Edinger Avenue  
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Ms. Content Arnold  
Remedial Project Manager  
Naval Facilities Engineering Command  
Southwest Division - Code 5BME.CA  
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TO: Ms. Triss Chesney  
Remedial Project Manager

FROM: Kimberly Foreman *KAF*  
Public Participation Specialist

DATE: April 19, 2000

SUBJECT: COMMENTS ON USMCAS EL TORO PROPOSED PLAN FOR  
SITES 7 AND 14

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Thank you for the opportunity to review this Proposed Plan. The following comments are submitted on behalf of DTSC's Public Participation Branch.

The Proposed Plan is very thorough, especially the section describing the risk assessment. However, the first page summary has too much detail for an introduction, which may make it confusing. Overall, it should be shorter and organized more toward presenting only the main points, leaving the detailed explanations for the body of the Proposed Plan. Most of my comments are focused on this first section, with some additional suggestions for clarifying various other parts of the document.

Since the suggestions for the first page will have the effect of shortening it quite a bit, I would recommend using a larger font for this page, which will also serve to distinguish this summary from the body of the Plan.

### SUMMARY PAGE:

1. Page 1, first paragraph, first sentence. The focus of this paragraph should be to invite comments on the Proposed Plan. Please change to first sentence to read "The Marine Corps is requesting comments from the public on the proposal for no further action at Installation Restoration Program (IRP) Operable Unit 3B Sites 7 and 14 at Marine Corps Air Station (MCAS) El Toro."
2. Page 1, first paragraph, second and third sentences. Please delete these sentences and replace them with the following:

"Site 7 (a former drop tank drainage area) and Site 14 (a former battery acid disposal area) are sites of low-level soil contamination resulting from past activities at the base."

3. Page 1, second paragraph. Please replace this paragraph with the following:

"This Proposed Plan provides the results of the environmental investigation of these two sites, and explains the basis for the proposal for no further cleanup action. More detailed information on these investigations and the analyses that led to the proposal are presented in the Draft Final Investigation Reports and the Draft Final Feasibility Study. These reports are available at the Heritage Park Regional Library in Irvine, and are part of the MCAS El Toro IRP Administrative Record file (see page 7). For information on the public comment process, see the text box at the bottom of this page."

4. Page 1, third paragraph. Please replace this paragraph with the following:

"The contamination at Sites 7 and 14 extends less than 10 feet below the ground, and it has been determined that it does not affect or pose a threat to groundwater. These sites are located above a large area of groundwater contamination that originated from Site 24 (see the box on page 3). However, this groundwater contamination is not associated with Sites 7 and 14 and is being addressed as part of the cleanup of Site 24."

5. Page 1, fourth paragraph. Please replace this paragraph with the following:

"The recommendation for no further action at these sites is based on the results of extensive field investigations, laboratory analyses, and a thorough assessment of potential human health risks. The MCAS El Toro Base Realignment and Closure (BRAC) Cleanup Team, made up of representatives from the Marine Corps, U.S. Environmental Protection Agency (U.S. EPA), and California Environmental Protection Agency (Cal-EPA), has carefully evaluated the investigation results. The team has determined that no cleanup action is necessary at the sites since the risk levels from the soil contamination fall within U.S. EPA's range of acceptable risks for protection of human health and the environment."

6. Page 1, fifth paragraph. Please delete this paragraph, since this information has been incorporated into the earlier paragraphs (revised versions).

## ENVIRONMENTAL INVESTIGATION OVERVIEW

1. Page 2, Introduction, first paragraph. Please insert the following after the first sentence: "The map on page 3 shows the location of these sites." After this, please insert a paragraph break, so that the sentence "Sites 7 and 14 were identified through a series of environmental studies..." will begin a new paragraph.

2. Page 2, Introduction, first paragraph. Please delete the last three sentences since this information is presented in the site descriptions.

3. Page 2, Introduction, second paragraph. Please merge the first sentence with the new second paragraph. Please delete the last two sentences.
4. Page 2, Investigation Approach, fourth paragraph. Please add quotation marks to the term "fate-and-transport" to indicate it is a term that will be explained (which it is, in following sentence).
5. Page 2, Investigation Results, first sentence. After the first sentence, please insert the following: "The Description of Chemicals on page 3 describes these contaminants." [My comments will recommend moving the glossary from page 5 to page 3 and renaming it]
6. Page 2, Investigation Results, line 11. Please add the word "feet" after the words "0 to 4".
7. Page 3, text box. The line describing OU-3 is somewhat confusing. Are Sites 1 and 16 in neither OU-3A nor OU-3B? If not, are they the only OU-3 sites that aren't part of a lettered subset? It would be clearer if the OU-3 descriptions were given in separate lines for each subset, as was done for the other OUs. Also, please indicate what kind of sites 1 and 16 are, since the others are described. If all of OU3 is shallow soil sites, please make it clear what the subsets are based on (such as geographical location, etc.).
8. Page 3, text box. I would recommend moving this text box farther into the document, possibly switching places with the Glossary. The Glossary should be on this page, to follow the description of contaminants in "Investigation Results," but the IRP description is not critical enough to require being presented so soon.

## HUMAN HEALTH RISK ASSESSMENT

This section is well written and clearly explained. However, I did have a few comments.

1. Page 4, Identifying Chemicals of Potential Concern, line 6. Please delete the phrase "presented in this proposed plan."
2. Page 4, Identifying Chemicals of Potential Concern, second paragraph, last sentence. Please change "are not a result" to "is not a result."
3. Page 4, Estimating Health Hazards, last sentence. Please hyphenate "over-estimation."
4. Page 5, Table 1. I would suggest adding a thin rule at the bottom of the table to more clearly distinguish it from the text below.
5. Page 5, text box (No Impact on Groundwater), last sentence. Please delete the reference to the box on page 3 since that text doesn't have enough additional information to be worth turning to. This groundwater description seems clear enough on its own.

6. Page 5, Glossary of Chemical Terms. I would suggest moving this up to page 3, to immediately follow the first description of contaminants (on page 2). I would also suggest renaming this "Description of Chemicals," since it's not really in glossary form. Also, I would suggest taking off the bold except for the names of the chemicals and other substances described.

#### WHERE TO GET MORE INFORMATION

1. Page 7, list of contacts. Please change Claire Best's name and address to:

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Cal-EPA, Department of Toxic Substances Control  
5796 Corporate Avenue  
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