



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Edwin F. Lowry, Director
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Gray Davis
Governor

December 1, 2000

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Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
Base Realignment and Closure
P.O. Box 51718
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RESPONSE TO COMMENTS DRAFT PROJECT WORK PLAN, REVISION 1, FOR
PRE-DESIGN ACTIVITIES AT INSTALLATION RESTORATION SITES 3 AND 5, AND
DEBRIS DISPOSAL FROM SITE 1, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above response to comments for the draft Project Work Plan (Work Plan) that was received by this office by electronic mail on October 24, 2000. The draft Work Plan describes the objectives and procedures for pre-design activities at Sites 3 and 5 and waste management activities at Sites 1 and 24. The pre-design activities include trenching to verify the landfill boundaries at Sites 3 and 5 and clearing concrete and asphalt to prepare for the radiological survey at Site 3. The waste management activities include off-site disposal of stockpiled debris (metallic material and soil) from Site 1 and dismantling and disposal of soil vapor extraction system piping from Site 24.

As a result of the comments received on the Work Plan, the scope of work was changed for Site 1. As discussed at the Base Realignment and Closure Cleanup Team meeting on September 27, 2000, the new scope of work includes disposal of only the surficial metallic debris and not the stockpiled soil. Additionally, DTSC understands that the Department of the Navy (DON) plans to separate the work presented in the draft Work Plan into the following three documents:

- Preparing for the radiological survey, including removal of metallic debris from Site 1 and removal of concrete and asphalt at Site 3
- Trenching at Sites 3 and 5 to define the landfill boundaries
- Dismantling and disposal of soil vapor extraction piping from Site 24

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DTSC also understands that the current priority for the DON is to finalize the work plan for radiological survey preparation for Sites 1 and 3. As a result, DTSC reviewed the response to comments specifically regarding the removal of metallic debris from Site 1 and asphalt and concrete from Site 3. Following review, DTSC has the following comment.

1. DTSC Comment Number 8 regarding Section 6.2.3 - Waste Disposal: The third paragraph identifies two Class I hazardous waste disposal facilities that will be considered for hazardous waste disposal. Please specify each waste stream and the anticipated disposal facility in the Work Plan. The response to this comment did not include this information.

Additional comments from the DTSC Industrial Hygiene and Field Safety Section are enclosed. Please contact me at (714) 484-5395 if you have any questions.

Sincerely,



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

Enclosure: Comments from the DTSC Industrial Hygiene and Field Safety Section, dated November 16, 2000.

cc: Mr. Glenn Kistner
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Department of Toxic Substances Control



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MEMORANDUM

TO: Triss Chesney
Hazardous Substances Scientist
Office of Military Facilities

FROM: Julie Kim, M.S. *Julie Kim*
Assistant Industrial Hygienist
Industrial Hygiene and Field Safety Section (IHFSS)
Human and Ecological Risk Division (HERD)

DATE: November 16, 2000

SUBJECT: Marine Corps Air Station (MCAS), El Toro
Pre-Design Activities
Revised Health and Safety Plan
PCA: 14742 Site Code: 400055-47

BACKGROUND

On October 25, 2000, the Office of Military Facilities in Cypress requested the IHFSS to review and comment on responses to comments for the proposed revised health and safety plan (HASP) addressing pre-design activities at the Military Corps Air Station (MCAS) facility in Irvine, California.

MCAS El Toro (referred to as the Station) is located in a semi-urban, agricultural area of southern California, approximately 8 miles south of Santa Ana and 12 miles northeast of Laguna Beach. MCAS El Toro covers approximately 4,740 acres. The land northwest of the Station is used for agricultural purposes and the land around the MCAS includes commercial, light industrial, and residential areas.

MCAS El Toro was commissioned in 1943 as a Marine Corps pilot fleet operation training facility. The Station's mission involved operation and maintenance of military aircraft and ground-support equipment. Historical activities on the Station included aircraft maintenance and repair. These activities generated waste oils,

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solvents, paint residues, hydraulic fluid, used batteries, and other wastes. MCAS El Toro closed on July 2, 1999 as part of the Base Realignment and Closure (BRAC) Act. A brief description and operational history of Sites 1, 3, 5, and 24 is presented below.

Installation Restoration Program (IRP) Site 1 (Explosive Ordnance Disposal Range)

IRP Site 1 is the former explosive ordnance disposal (EOD) range and is located in the northeast corner of MCAS El Toro in the foothills of the Santa Ana Mountains. IRP Site 1 is situated within a tributary canyon of Borrego Canyon Wash at elevations ranging from approximately 610 to 760 feet above mean sea level. Training in the disposal and detonation of munitions began at IRP Site 1 in 1952 (Jacobs Engineering Group, Inc., 1993). Military ordnance used in training at the site has included hand grenades, land mines, cluster bombs, smoke bombs, and rocket warheads. Civilian and commercial explosives, such as trinitrotoluene, dynamite, and plastic and gelatinous explosives were also disposed at the EOD range. Munitions were detonated in trenches and pits that were continually filled with soil and re-excavated.

In 1982, approximately 2,000 gallons of sulfur trioxide chlorosulfonic acid (FS smoke) were reportedly disposed in trenches located in the northern portion of the site and munitions (i.e., flares and small ordnance). An estimated 300,000 gallons of petroleum fuels were used during training activities from 1952 through 1993 (Jacobs Engineering Group, Inc., 1993). In addition, there are unsubstantiated reports that low-level radioactive material may have been used in training exercises at the site. Perchlorate was identified as a potential contaminant of concern at IRP Site 1 due to its use in explosives and propellants.

IRP Site 3 (Original Landfill)

Near the corner of Desert Storm Road and Irvine Boulevard, the former north gate for MCAS El Toro is located in an asphalt and concrete covered area which is used as a treatment bio-pile pad by other contractors at the Station. This unit is located within the fenced boundaries of MCAS El Toro and sits on top of another former landfill. Suspected wastes and contaminants include metals, incinerator ash, solvents, paint residues, hydraulic fluids, engine coolants, construction debris, oily wastes, municipal solid wastes, and various inert solid wastes.

IRP Site 5 (Perimeter Road Landfill)

IRP Site 5, Perimeter Road Landfill, is located adjacent to Perimeter Road, in the southeast quadrant of MCAS El Toro, adjacent to the eastern property boundary

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and approximately 800 feet north-northwest of Borrego Canyon Wash. Land uses adjacent to the site include agriculture, recreational, and flight line operations (prior to closure of the Station). Agricultural areas consisting of strawberry fields and orange groves are located immediately to the north and east of the site. The Station golf course is south of the site. Suspected wastes and contaminants disposed at IRP Site 5 include burnable trash; municipal solid waste; cleaning fluids; scrap metals; paint residues; and unspecified fuels, oils, and solvents. Almost any type of waste generated at MCAS El Toro may have been disposed in this landfill.

IRP Site 24 (Potential VOC Source Area)

IRP Site 24, Potential VOC Source Area, was established for an expanded groundwater source investigation in the proximity of IRP Sites 7, 8, 9, 10, and 22. The Phase I remedial investigation indicated that one or more sources might exist for the VOCs in groundwater in the vicinity of these sites.

This project is estimated to require up to two months of field activity and will encompass the following activities and tasks:

- Excavate trenches to confirm boundaries of landfills at IRP Sites 3 and 5
- Remove and demolish asphalt and concrete at IRP Site 3
- Dispose of objects and surficial metallic debris stockpiled at IRP Site 1
- Collect soil, liquid, and sludge samples for waste characterization
- Dismantling and disposal of soil vapor extraction system piping at IRP Site 24

DOCUMENT REVIEWED

The IHFSS reviewed the responses to comments for the proposed revised "Health and Safety Plan" for the Pre-Design Activities at the MCAS Facility located at Trabuco Canyon Road in Irvine, California dated October 20, 2000 (Original DTSC comments dated September 5, 2000). Foster Wheeler Environmental Corporation in San Diego, California prepared the responses for Southwest Division Naval Facilities Engineering Command Contracts Department in San Diego, California.

GENERAL COMMENTS

IHFSS reviewed the responses to comments for the proposed revised health and safety plan for compliance with Title 8, California Code of Regulations (T8 CCR), DTSC's policies and guidelines, and the NIOSH/OSHA/USCG/EPA Guidance Manual as well as other appropriate State and Federal Health and Safety Regulations. The review of the responses to comments for the proposed revised health and safety plan is not a guarantee that the final plan will be properly and safely implemented; implementation is the employer's responsibility.

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SPECIFIC COMMENTS TO THE WORK PLAN

1. Response #2.

The CIH preparing the plan had previous experience with the sites in more intrusive than the projects planned under this current plan. The type of contamination is soil. The contamination in soil was below limits that would pose an occupational health risk for inhalation and PPE is specified where there is direct contact with the soil.

With the understanding that the contamination in soil was below limits that would pose an occupational health risk for inhalation, please include the maximum concentrations discovered in soil in previous investigations for each chemical of concern. What limits were these chemical concentrations in soil compared with? (Cal-OSHA PEL?)

2. Response #5.

There is a potential to use an air-purifying respirator. However, if such use is warranted as specified in the plan, the SHSS is to immediately call the PESM who is a CIH, to discuss the use of the respirator and the cartridge change schedule which the CIH will provide the SHSS at that time.

Because the HASP does not discuss the use of respirators with specified cartridge-types and corresponding change-out schedules, the HASP must be amended if/when such use is warranted before work can commence further. Please include language in the plan indicating such actions will take place if/when warranted.

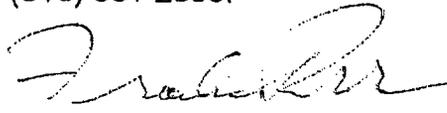
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CONCLUSION

The site HASP is intended to be a functional stand-alone document. The plan is used to educate and familiarize the on-site workers with the site history, proposed work activities, known or potential health hazards, emergency action plans and the site safety information that is necessary to mitigate the risks from the identified hazards. In utilizing the site HASP, field staff must be able to obtain sufficient information to compile an accurate assessment of the site safety issues associated with every job function.

The submitted responses address the comments well. The IHFSS recommends revisions to the final HASP as noted previously. If questions should arise, please contact Julie Kim at (818) 551-2855.

Peer Reviewed by:



Frank Parr, CIH
Senior Industrial Hygienist

cc: HERD chron file

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cc: Ms. Julie Kim
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