

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL



Region 4  
West Broadway, Suite 425  
Long Beach, CA 90802-4444  
(310) 590-4868

MAR 14 1996

March 12, 1996

Mr. Joseph Joyce  
BRAC Environmental Coordinator  
U.S. Marine Corps Air Station - El Toro  
P. O. Box 95001  
Santa Ana, California 92709-5001

Dear Mr. Joyce:

**SUBMITTAL OF FINAL RESULTS OF EMPLOYEE INTERVIEW, AUGUST 17, 1995,  
CLEAN II ENVIRONMENTAL MANAGEMENT OF MCAS EL TORO, CTO-0080**

The Department of Toxic Substances Control (DTSC) has had an opportunity to share the above mentioned letter dated January 9, 1996. As a result of this review, some items need further clarifications on a site by site basis. Enclosed are DTSC comments and recommendations requesting that additional information be added which clarifies the reasoning for the No Further Action determinations.

Although there is no mandated time frame for the completion of this project, we would appreciate a new document which addresses the concern expressed by our agency, within 30 days. If you have questions concerning this project, please contact me at (310) 590-4891.

Sincerely,

Tayseer Mahmoud  
Remedial Project Manager  
Region 4 - Base Closure Unit  
Office of Military Facilities

Enclosure

cc: Ms. Bonnie Arthur  
U. S. Environmental Protection Agency  
Region IX  
Hazardous Waste Management Division, H-9-2  
75 Hawthorne Street  
San Francisco, California 94105-3901



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cc: Mr. Lawrence Vitale  
Remedial Project Manager  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, California 92501-3339

Mr. Larry Newsome  
Department of the Navy  
Naval Facilities Engineering Command  
Environmental Division  
1220 Pacific Highway, Room 18  
San Diego, California 92132-5181

Mr. David Cowser  
Bechtel National, Inc.  
401 W. "A" Street, Suite 1000  
San Diego, California 92101-7905

Mr. Vish Parpiani  
Environmental and Safety  
Marine Corps Air Station-El Toro  
P. O. Box 95001  
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Mr. Dante Tedaldi, Ph.D., P. E.  
Bechtel National, Inc.  
401 W. "A" Street, Suite 1000  
San Diego, California 92101-7905

Ms. Marsha Mingay  
Public Participation Specialist  
Department of Toxic Substances Control  
245 West Broadway, Suite 350  
Long Beach, California 90802

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

Region 4

215 West Broadway, Suite 425  
Beach, CA 90802-4444**M E M O R A N D U M**

**TO:** Tayseer Mahmoud  
Remedial Project Manager

**FROM:** Marsha Mingay  
Public Participation Specialist *ngm*

**DATE:** February 21, 1996

**SUBJECT: BECHTEL NATIONAL INC.'S JANUARY 9, 1996 SUBMITTAL OF  
FINAL RESULTS OF EMPLOYEE INTERVIEW AUGUST 17, 1995**

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On behalf of the Public Participation Unit, I have reviewed the above referenced document. It was noted that our September 11, 1995 comments were partially incorporated. Many of the sites identified by Mr. White are still without adequate information documenting the factual reasons for the "No further review needed". The Public Participation Unit is concerned that the current document will not provide sufficient information to allow reviewers of the files to understand the recommendations and decisions made by our agencies.

Below is an outline of the sites which need further information to substantiate the BCT recommendation of "No further review needed". Please review the information, and if you are in agreement with our position, we suggest that the document be amended to reflect the information which led to the recommendation of "No further review needed".

**Site 6*****Chemicals of concern: waste oil and jet fuel***

According to the "follow up" section, "The area appears to be contained within SWMU 46. ... stained areas ... have been investigated under the RCRA Facility Assessment ..."

The above information does not indicate what was found in the investigation. The BCT recommendation of "No further review needed" has not be substantiated. Additionally, it leaves the reader wondering **IF** the area will be addressed in the SWMU 46 investigation since the wording is not conclusive.



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Site 7

*Chemicals of concern: petroleum lubricants, oils and waste paints*

According to the "follow up" section, the area "may have been investigated as part of SWMU 264. ... SWMU 264 has been recommended for no further action."

Since the explanation yields uncertainty as to whether an investigation was done for the area in question, and yet the BCT recommends "no further action", there needs to be a definitive statement which supports our decision, or we need to review the area further.

Site 8

*Chemical of concern: napalm*

According to the "follow up" section, "no information of RFA or IR investigations in this area was found.

Since we do not have any information to prove that a release did not occur, what information was used to make the "no further review needed" recommendation? Please provide additional information supporting the recommendation, or state that the BCT/SWDIV will review further.

Site 9

*Chemical of concern: solvent*

The Follow up Section states, "No information of RFA or IR investigation in this area was found. BCT recommends "No further review needed".

The recommendation needs to be substantiated (see comments for Site 7 and 8).

Site 10

*Chemicals of concern: solvents (toluene, methyl ethyl ketone and xylene)*

The Follow up Section states, "No information of RFA or IR investigation in this area was found." BCT recommends "No further review needed".

The recommendation needs to be substantiated (see comments for Site 7 and 8).

Site 12

Chemicals of concern: paint, petroleum lubricant, oils, solvents, Freon 111, Freon 113, and "B&B slurry solution"

- a) The Follow up Section states that the paint area "may be" included in SWMU 138.

Explain how the above information led to the recommendation of "No further review needed".

- b) A storm drain which reportedly received paints, petroleum lubricants and oils, solvents, Freon 11, and Freon 113 "may have emptied into the oil-water separator [which was investigated in connection with SWMU 139].

It is unclear if the BCT, or Mr. White, is uncertain that the storm drain emptied into the oil-water separator. If the storm drain did not empty into the separator, would the investigation of the separator have bearing on these releases? Additionally, if the investigation is pertinent to this reported releases, provide information which states the results of this investigation and how it related to the "no further review needed" recommendation.

Site 14

*Chemical of concern: kerosene*

The Follow up Section states, "No information if RFA or IR investigations in this area was found."

The recommendation needs to be substantiated (see comments for Site 7 and 8).

Site 17

*Chemical of concern: Spillage of "out of specification paints"*

The Follow up Section states, "No information if RFA or IR investigations in this area was found."

The recommendation needs to be substantiated (see comments for Site 7 and 8).

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Site 19

*Item of concern: mobile oxygen generation unit*

The Follow up Section states, "No information if RFA or IR investigations in this area was found."

The recommendation needs to be substantiated (see comments for Site 7 and 8).

Site 23

*Chemical of concern: oil*

The Follow up Section states, "No information if RFA or IR investigations in this area was found."

The recommendation needs to be substantiated (see comments for Site 7 and 8).

Site 24

*Chemical of concern: waste from abandoned automobiles*

The Follow up Section states, "No information if RFA or IR investigations in this area was found."

The recommendation needs to be substantiated (see comments for Site 7 and 8).