

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
 5 West Broadway, Suite 425
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February 17, 1995

Mr. Wayne D. Lee
 Assistant Chief of Staff
 Environment and Safety
 United State Marine Corps
 Marine Corps Air Station El Toro
 P.O. Box 95001
 Santa Ana, California 92709-5001

Dear Mr. Lee:

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL COMMENTS ON THE BASE
 CLOSURE PLAN (BCP)**

The Department of Toxic Substances Control (Department) has completed its review of Chapters 3, 4 and 6 of the proposed changes to the BCP. These were provided as a result of the Red Line meetings which all the Base Closure Team participated in. They were received on January 6, 1995.

The Department's comments are enclosed. Please revise the BCP as appropriate.

If you have any questions, please feel free to call at (310) 590-4919.

Sincerely,

Juan Jimenez
 Remedial Project Manager
 Region 4, Base Closure Unit
 Office of Military Facilities

cc: ✓ Mr. Joseph Joyce
 BRAC Environmental Coordinator
 Department of the Navy
 Naval Facilities Engineering Command
 Environmental Division
 1220 Pacific Highway, Room 18
 San Diego, California 92123-5185



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Mr. Lawrence Vitale
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
2010 Iowa Avenue, Suite 100
Riverside, California 92507-2409

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

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El Toro BCP Revision I, Draft Chapters 3, 4 and 6

The three chapters are well written and accurately reflect the Department's input during the BCP Red Line meetings with the following exceptions:

Chapter 3

Page 6, Paragraph 1: The paragraph in bold at the top of this version should stay in the final version. The Department, the United States Environmental Protection Agency and the Marine Corps are currently involved in schedule negotiations and it seems unlikely that the details will be available prior to the deadline for completion of this document.

Chapter 4

Page 5: A similar paragraph stating that the dates referenced in section 4.1.3 are tentative and subject to revision.

Chapter 6

Page 4: The issue of Background has not been adequately addressed. It will be addressed by Bechtel preparing and presenting a Technical Memorandum to the Team which will specify the options available for soils and groundwater. Please contact Bechtel and include a summary of the objectives of the Technical Memorandum..

Page 6: The section on Risk Assessments has major issues outstanding. As a result, a meeting will take place in San Francisco on February 21, 1995 to discuss and possibly come to resolution on these issues. Among other things, the project does not have an acceptable background approach or an acceptable Ecological Risk section. Please modify this section to accurately reflect the current situation as this section is entitled "Technical and Other Issues to be Resolved."