

RECEIVED
CODE 18

October 17, 1996 22 Oct 96 13 04



Cal/EPA

Department of
Toxic Substances
Control

245 West Broadway,
Suite 425
Long Beach, CA
90802-4444

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

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

**COMMENTS ON DRAFT FACT SHEET # 7 FOR MARINE CORPS AIR
STATION (MCAS) EL TORO**

Dear Mr. Joyce:

The Department of Toxic Substances Control (DTSC) has reviewed Draft Fact Sheet # 7 received via a facsimile on October 14, 1996. This letter is to transmit the enclosed DTSC comments prepared by our Public Participation Specialist, Ms. Marsha Mingay.

Thank you for giving us the opportunity to comment on the fact sheet. If you have any questions, please call me at (310) 590-4891.

Sincerely,

Tayseer Mahmoud
Remedial Project Manager
Base Closure Unit
Office of Military Facilities
Southern California Operations

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

Mr. Joseph Joyce
October 17, 1996
Page 2

cc: Mr. Bob Coleman
Bechtel National, Inc.
401 West A street, Suite 1000
San Diego, California 92101-7905

Mr. Andy Piszkin
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division, Code 1831.AP
1220 Pacific Highway
San Diego, California 92132-5187

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



California/EPA

Department of
Toxic Substances
Control

145 West Broadway,
Suite 425
Long Beach, CA
562-4444



Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

MEMORANDUM

TO: Tayseer Mahmoud
Remedial Project Manager

FROM: Marsha Mingay *mm*
Public Participation Specialist

DATE: October 17, 1996

SUBJECT: COMMENTS ON DRAFT FACT SHEET NUMBER 7 FOR
MCAS EL TORO

On behalf of the Department, I have reviewed the above referenced document. Based upon this review, it is strongly suggested that the material be reduced. Since the community does not currently have an opportunity to comment on this document, it is doubtful whether the general community will put forth the effort to read a 6 page fact sheet filled with technical details. Therefore, it is suggested that much of this material be transferred to the upcoming Proposed Plan fact sheet. Sharing the information at that time will be more appropriate since the community can participate in the proposed conclusions.

Specifically, it is suggested that Fact Sheet Number 7 includes only the following articles: 1) focus box, 2) Environmental Investigation Reaches Completion, 3) Next Step: Proposed Plans and Public Comment, 4) An Opportunity to See Project Documents, 5) Installation Restoration Program Helps Drive Cleanup Activity, 6) Local Advisory Board Paves Way for Public Participation, 7) Where to Get More Information, 8) Mailing List Coupon, 9) Figure 1, and 10) Figure 3.

By focusing on these articles, the fact sheet will not only provide the reader with a concise description of the RI/FS, but will educate the reader on the various activities MCAS El Toro is conducting to involve the public.

The following comments represent specific comments on the articles included in the current draft Fact Sheet Number 7.



Tayseer Mahmoud
October 17, 1996
Page 2

Article: Environmental Investigation Reaches Completion

General Comments:

It is suggested that this article include subheadings to call specific attention to the various topics being covered (e.g., purpose of an RI/FS, risk assessment, key findings, and organization of the IRP sites).

The fact sheet continually refers to a "regional groundwater" area but does not define what this term means. Additionally, Figure 1 does not show a regional groundwater zone. Please define this term and include it in Figure 1.

The article states that the RI is a comprehensive investigation. This can be interpreted that the comprehensive RI addresses the entire base. To eliminate this conclusion, please state that the RI focuses on two main areas within MCAS El Toro.

Specific Comments:

First Paragraph: The last sentence in the first paragraph needs to be reworded to differentiate between naturally occurring chemicals and chemicals found in the media due to contamination. Please reword to read: "... identifying sources of chemical contamination in the soil and ..."

Second Paragraph: To avoid a run on sentence and to provide clearer information to the reader, rewrite the first sentence into two sentences (e.g., "... (IRP) Site 24. Site 24 is the source of the contamination.")

Third Paragraph: This paragraph is a perfect lead into the information contained within the fifth paragraph. Therefore it is suggested that the two paragraphs be placed in the following sequence, " potential remedial (cleanup) alternatives. [new paragraph] Risk assessment results show that the contamination ...".

Article: Local Advisory Board Paves Way ...

First Paragraph: As the first sentence is written, it is unclear what connection exists between the complete closure of MCAS El Toro and the public

Tayseer Mahmoud
October 17, 1996
Page 3

playing a vital role. Perhaps it would be more direct to state that the public is playing a vital role in the environmental cleanup program.

Article: Where to Get More Information

Pursuant to an agreement between Mr. Wayne Lee, Mr. John Scandura and Ms. Marcia Murphy, the fact sheets will provide a point of contact from each agency (see attached letter). The Department thereby requests that the current Public Participation Specialist be included in the list of contacts. Therefore, please include the following information: Ms. Marsha Mingay, Public Participation Specialist, Department of Toxic Substances Control, 245 West Broadway, Suite 350, Long Beach, California 90802, (310) 590-4881.

Figure 1

Please correct the legend so that it reflects the types of line used to define MCAS El Toro's boundaries.

Figure 2

If this figure is used, please place the name of each zone to the side of the map since it may be unclear to a non technical person that the horizontal lines indicate separate zones. Also include a name for the zone which is directly below the principal aquifer. Additionally, please clarify or delete the delta symbol.

Figure 3:

Add the word "final" immediately before "RI Reports" in the arrow entitled, "OU: 2B & 2C".

Create a new arrow which states, "OU 2B & 2C: Draft FS report completed".

All remaining articles:

General Comment:

According to Dr. Covello, noted authority in Risk Communication, the length of a sentence is one indicator of grade level; with more words indicative of a higher grade level. Since he recommends that written material be aimed at the 6 to 8th grade level, please carefully review the sentences and reduce the complex material by creating sentences with one main subject.

Specific Comment:

The second paragraph in article, "VOC Contamination Originates..." should state that the 6,000 pounds of TCE are contained in the soil as vapor. The paragraph should also mention the RI conclusion that there are 2,000 pounds of TCE in the shallow groundwater beneath Site 24. Additionally, please verify that it is the *northwest* direction where lesser concentrations appear.

The second paragraph in article, "What the Investigation Found" states that the main objective of the investigation was to identify specific areas where VOC contamination was present. The layperson may wonder that since you only looked for VOC contamination, other chemicals of potential harm to the public and environment are present in the soil and groundwater. Please provide additional information which addresses this concern.

The article, "Site 24 Contamination Affects Regional Groundwater", compares TCE concentrations to drinking water standards. Please use additional caution when using jargon such as "exceed federal drinking water standards" and "below the federal and state drinking water standards" since the public may misinterpret the information. According to Dr. Covello, it is best to use phrases such as "meets the standard" or "is better than the standard" in comparing concentrations to established standards.

The articles, "Human Health and Ecological Risk Assessments" and "What the Risk Assessments Concluded", do not address health risks from the ingestion of food products irrigated by the agricultural wells which draw water from the contaminated zone. This concern should be addressed. Additionally, the fact sheet states (first paragraph in article, "What the Risk ..."), "... The small amounts of volatile organic compounds that may be present readily evaporate into the air during irrigation and therefore have no significant impact on agricultural

Tayseer Mahmoud
October 17, 1996
Page 5

activities". The community may inquire what risk is posed to the individual (such as the agricultural laborer) who breathes the contaminated air. Please include information which addresses this concern.

Attachment

cc: Administrative File

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

400 STREET, 4TH FLOOR
P. O. BOX 806
SACRAMENTO, CA 95812-0806



(916) 324-8295

May 15, 1996

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

Dear Mr. Lee:

Thank you for meeting with John Scandura, Jane Diamond and me on May 2, 1996 regarding issues related to the El Toro Community Relations Plan (CRP). I was very pleased that we were able to reach resolution that was acceptable to all of us.

Below, I have summarized our conclusions:

1. The points of contact on page 1-1 of the CRP will list: Joseph Joyce, Base Realignment and Closure Environmental Coordinator for El Toro MCAS; Fraser Felter, Community Relations Coordinator for U. S. EPA; Marsha Mingay, Public Participation Specialist for DTSC; and Captain Brad Bartelt, Base Realignment and Closure Public Affairs Officer for El Toro MCAS. This modification will be handled as a replacement page to the current page 1-1.
2. Roles and Responsibilities of Each Agency. El Toro MCAS, U. S. EPA and DTSC will prepare a paragraph which describes its own roles and responsibilities for community relations and the installation restoration program. These will be combined under one section and added to the current CRP as an errata page.
3. Fact Sheets - Points of Contact. Based on the subject matter of each fact sheet, each agency will determine its preferred contact to be listed. In some cases the contact may be a community relations or public participation person, and in some cases the agency may prefer to utilize a project manager.



Mr. Wayne Lee
May 15, 1996
Page Two

I believe this summarizes our conclusions. Again, thank you for this opportunity for a quick resolution. I appreciate your accessibility and willingness to work with our oversight agencies on this issue and any future matters we may encounter.

Sincerely,



Marcia Murphy
Chief, Public Participation and Education Branch

cc: John Scandura
Chief, Southern California Office of Military Facilities
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, California 90802

Jane Diamond (H-9-2)
Chief, Navy Section
Federal Facilities Cleanup Office
U. S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, California 94105

Mr. Wayne Lee
May 15, 1996
Page Three

bcc: Ms. Claire Best
Public Participation Supervisor
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, California 90802

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