



BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-92-D-4670

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TO: Contracting Officer
 Naval Facilities Engineering Command
 Southwest Division
 Mr. Richard Selby, Code 57CS1.RS
 Building 127, Room 112
 1220 Pacific Highway
 San Diego, CA 92132-5187

DATE: September 25, 1997

CTO #: 0135

LOCATION: MCAS El Toro

FROM: [Signature]
 D. J. Tedaldi, Ph.D., P.E., Project Manager

DESCRIPTION: Response to Comments on Draft ROD, Operable Units 2A and 3A, No Action Sites
and Associated Responsiveness Summary (Various Dates)

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401 West A Street
Suite 1000
San Diego, CA 92101-7905

CLEAN II Program
Bechtel Job No. 22214
Contract No. N68711-92-D-4670
File Code: 0222
IN REPLY REFERENCE: CTO-0135/0102

September 25, 1997

Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 57CS1.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA 92132-5187

Attention: G. Steinway, Code 56MC.GS

Subject: Response to Agency Comments on Draft Record of Decision, Operable Units 2A and 3A - No Action Sites

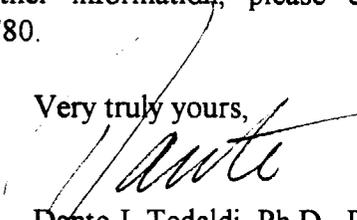
Dear Mr. Selby:

It is our pleasure to submit this Response to Agency Comments on the Draft Record of Decision (ROD), Operable Units 2A and 3A - No Action Sites, for the Marine Corps Air Station (MCAS) El Toro, California, prepared under Contract Task Order (CTO) 0135 and Contract No. N68711-92-D-4670. This document is submitted in accordance with the Federal Facilities Agreement and the associated schedule for that agreement.

We gratefully acknowledge the high level of cooperation and team work demonstrated by personnel from MCAS El Toro, Southwest Division, the United States Environmental Protection Agency, California Department of Toxic Substances Control, and Regional Water Quality Control Board - Santa Ana Region which has facilitated the timely submittal of this document.

We have submitted the appropriate number of copies of this report to individuals listed on the attached transmittal. We appreciate the opportunity to be of service to you on this project. If you have any questions or would like further information, please contact Jane Wilzbach at (619) 687-8861, or myself at (619) 687-8780.

Very truly yours,


Dante J. Tedaldi, Ph.D., P.E.
Project Manager

DJT/sp

Enclosure: Response to Agency Comments on Draft Record of Decision, Operable Units 2A and 3A - No Action Sites



Bechtel National, Inc. Systems Engineers-Constructors

**RESPONSE TO COMMENTS
DRAFT RECORD OF DECISION,
OPERABLE UNITS 2A AND 3A, NO ACTION SITES
MCAS EL TORO, CALIFORNIA**

<p>Originator: Tayseer Mahmoud, Remedial Project Manager DTSC</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: September 2, 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>COMMENTS</u></p> <p>1. <u>Page 2, Declaration Statement:</u> The signature block "Director of Military Facilities" should be changed to "Office of Military Facilities".</p>	<p><u>RESPONSE TO COMMENTS</u></p> <p>RESPONSE 1: The signature block has been revised as requested.</p>
<p>2. <u>Page 2-1, Site History and Enforcement Activities, 2nd paragraph:</u> The text mentions RWQCB and California Environmental Protection Agency (Cal/EPA) have been involved in overseeing the investigation. The text should be revised to state that RWQCB and DTSC have been involved in overseeing the investigation because both RWQCB and DTSC are part of Cal/EPA.</p>	<p>RESPONSE 2: The paragraph has been revised as requested.</p>
<p>3. <u>Section 3, Highlights of Community Participation:</u> The second and third sentences in Section 3.1 need to be corrected for grammar and completeness. They should read, "... local elected officials and regulatory . . . RAB meetings occur every two months, are open to the public, and include interested representatives from the Marine Corps/Navy, city and county offices and regulatory agencies". Regarding Table 3-1 and Section 3.3, please refer to DTSC's Public Participation Specialist comments number 8.a, 9.c and 9.d on the draft ROD for Site 24 (sent to you on July 23, 1997).</p>	<p>RESPONSE 3: The second and third sentences in Section 3.1 have been revised as suggested. Comments made by DTSC's Public Participation Specialist on the draft ROD for Site 24 have been reviewed and Section 3 has been revised based on these comments.</p>

**RESPONSE TO COMMENTS
DRAFT RECORD OF DECISION,
OPERABLE UNITS 2A AND 3A, NO ACTION SITES
MCAS EL TORO, CALIFORNIA**

<p>Originator: Michael J. Adackapara, Chief RWQCB</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: September 9, 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>COMMENTS</u></p> <p>1. We reviewed the above-referenced document dated August 1997 and received by us on August 19, 1997. We find that the report meets our requirements.</p>	<p><u>RESPONSE TO COMMENTS</u></p> <p>RESPONSE 1: Comment noted.</p>

**RESPONSE TO COMMENTS
DRAFT RECORD OF DECISION,
OPERABLE UNITS 2A AND 3A, NO ACTION SITES
MCAS EL TORO, CALIFORNIA**

<p>Originator: Glenn R. Kistner, Remedial Project Manager U.S. EPA</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: August 28, 1997</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>COMMENTS</u></p> <p>1. <u>Page 1, Declaration - last sentence last paragraph:</u> Please change sentence to read: "Since hazardous substances are not present at concentrations above unacceptable levels, CERCLA Section 121 cleanups standards do not apply."</p>	<p><u>RESPONSE TO COMMENTS</u></p> <p>RESPONSE 1: The sentence has been revised as suggested.</p>
<p>2. <u>Page 5-8, Table 5-3:</u> The table list dioxins and furans found at Site 9. Given the relative high profile of dioxin compounds in the public media, it would be helpful and informative to include a brief narrative to explain the particular dioxin isomer found at Site 9 and why it was not considered a risk "driver."</p>	<p>RESPONSE 2: Since site risks are not discussed until Section 6 of the ROD, the following explanation was added to the notes associated with Table 6-1:</p> <p>"Octachlorodibenzo-p-dioxin was the particular dioxin isomer found at Site 9. Octachlorodibenzo-p-dioxin was not determined to be a risk driver because the cancer risk associated with this compound was estimated to be 5.5×10^{-7} under a residential land use scenario. The cancer slope factor (CSF) for octachlorodibenzo-p-dioxin was derived by multiplying the CSF for 2,3,7,8-tetrachlorodibenzo-p-dioxin by a toxicity equivalency factor (TEF). The TEF relates the toxicity of octachlorodibenzo-p-dioxin to that of 2,3,7,8-tetrachlorodibenzo-p-dioxin. The TEF used in this risk assessment (0.001) was defined in an 1989 international scheme, adopted by U.S. EPA as an interim procedure for assessing the risks associated with exposures to mixtures of chlorinated dioxins and dibenzofurans."</p>
<p>3. <u>Section 5.11, Site 25:</u> Please include a table on human health risks concerning the site. Including a table such as Table 6-3 of the Draft Phase II Remedial Investigation and Feasibility Study, Site 25 would make it more consistent with the human health risk tables for the other sites.</p>	<p>RESPONSE 3: A summary table on human health risks for Site 25 has been added. This table shows the risks due to surface water at San Diego Creek under a recreational scenario. Risks due to sediment were evaluated quantitatively and qualitatively under a residential scenario. Both the recreational and residential scenarios are discussed in Section 6 of the ROD.</p>
<p>4. <u>Page 5-24:</u> The last bullet states that soil gas samples were used to assess potential contribution of the drainages to the regional VOC contamination, yet there was no further discussion of the results in the text. Please</p>	<p>RESPONSE 4: A discussion of soil gas results has been added.</p>

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<p>Originator: Glenn R. Kistner, Remedial Project Manager U.S. EPA</p> <p>To: Joseph Joyce BRAC Environmental Coordinator</p> <p>Date: August 28, 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p style="text-align: center;">include a table or a summary discussion of the results.</p>	
<p>5. <u>Page 7-1:</u></p> <p>The first paragraph states that “under the no action alternative, monitoring, periodic reviews and deed restrictions including deed notification are not required.” This sentence is confusing. First, even if DON decided to have monitoring, this does not change the no action alternative for these sites. Monitoring is not considered an action. Reference to deed restrictions and deed notification in this sentence is also confusing because deed restrictions are considered part of institutional control which is considered a remedy. Therefore, if DON decided to put deed restrictions here, this will no longer be a no action alternative. EPA is not sure what DON means by deed notification. If they mean general notice required under 120(h), then such notice is still required if these sites were ever to be transferred, regardless of whether these are no action sites. EPA suggests this sentence should be rewritten: “DON will not conduct monitoring or periodic reviews of these sites . . .” and delete reference to deed restrictions and deed notice.</p>	<p>RESPONSE 5: The sentence has been rewritten as suggested.</p>

RESPONSE TO COMMENTS
RESPONSIVENESS SUMMARY ASSOCIATED WITH DRAFT RECORD OF DECISION,
OPERABLE UNITS 2A AND 3A, NO ACTION SITES
MCAS EL TORO, CALIFORNIA

<p>Originator: Ms. Marsha Mingay, Public Participation Specialist DTSC</p> <p>To: Mr. Tayseer Mahmoud Remedial Project Manager</p> <p>Date: September 19, 1997</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0135 File Code: 0222</p>
<p><u>COMMENTS</u></p> <p>1. Although the document does a good job in defining all acronyms, the following were missed. Please ensure that these acronyms are spelled out the first time they are used in each new response as commentators will first look at the responses to their individual comment. This being the case, they would not know the definition of an acronym that has not been defined.</p> <p style="padding-left: 40px;">LRA, Page 2 CERCLA, Page 2, 5, 15 VOC, Page 6 ROD, Page 6, 10, 11 DTSC, Page 7, 10 RWQCB, Page 7, 10 DON, Page 7, 10, 15 NCP, Page 7, 10, 11</p>	<p><u>RESPONSE TO COMMENTS</u></p> <p>RESPONSE 1: The acronyms have been defined as requested.</p>
<p>2. <u>Page 6, Response to Comment 6, 2nd paragraph:</u></p> <p>Since the preceding paragraph talks about two RODs, please specify which ROD is being referred to in the second paragraph.</p>	<p>RESPONSE 2: The clarification has been made as requested.</p>
<p>3. <u>Page 7, Response to Comment 6, 2nd full paragraph:</u></p> <p>After explaining how contact could occur at Site 4, restate that using this scenario, the residential risk is less than 1 in 10,000.</p>	<p>RESPONSE 3: The paragraph has been modified to confirm that, using the residential scenario, the risk at Site 4 is less than 1 in 10,000.</p>
<p>4. <u>Page 10, Response to Comment 9A:</u></p> <p>The document states, "Responses are not sent directly back to the person making the comment." Although not specifically required by regulation, the Department of Toxic Substances Control implements a policy of sending everyone who comments a copy of agency's</p>	<p>RESPONSE 4: It is not the Navy's policy to send the Responsiveness Summary to individuals who submit comments during the public comment period for the Proposed Plan. The entire Responsiveness Summary will be available for review in the administrative record files for MCAS El Toro and in the Information Repository located at the Heritage Park Library in Irvine,</p>

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<p>response. We believe that this accurately reflects the intent of the regulations and reduces the bureaucracy of sending commentators to an information repository to find the agency's response to their comments. It is our recommendation that the military continue public outreach activities in a proactive and cooperative manner by forwarding the Responsiveness Summary to the individuals who made the comments.</p>	<p>California.</p>
<p>5. <u>Page 12, Response to Comment 1:</u></p> <p>The Responsiveness Summary does not address the comment regarding MTBE. Please provide additional information.</p>	<p>RESPONSE 5: The following information has been added to the response:</p> <p>MTBE is a synthetic organic ether that has been used to enhance the octane level in gasoline since the early 1980s. MTBE has recently become more widely used as a result of the Clean Air Act Amendments of 1990, which require use of oxygenated fuels or reformulated gasoline in certain metropolitan areas where atmospheric concentrations of ozone or carbon monoxide exceed national ambient air quality standards.</p> <p>Soil samples taken from the No Action sites were not analyzed for MTBE because the fuel materials which were known to be released at these sites (e.g., JP-5, diesel oil, diesel fuel) do not contain MTBE. In addition, the releases that were known to have occurred at the sites generally took place before 1990 when the use of MTBE became widespread.</p>