



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

M60050.002854  
MCAS EL TORO  
SSIC NO. 5090.3

August 15,2002

BRAC Environmental Coordinator  
Base Realignment and Closure, Environmental Division  
Attn: Mr. Dean Gould  
P.O. Box 51718  
Irvine, CA 92619-1718

RJ: Draft Final Construction Quality Control Plan and Draft Final Contingency Plan,  
Landfill Sites 2 and 17, July 2002

Dear Mr. Gould:

EPA has reviewed the Draft Final Contingency Plan and Draft Final Construction Quality Control Plan for Sites 2 and 17 at Marine Corps Air Station, El Toro. Please find our comments enclosed.

If you have any questions, please call me at (415) 972-3012.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nicole G. Moutoux".

Nicole G. Moutoux  
Project Manager  
Federal Facilities Cleanup Branch

Enclosures

cc: Gordon Brown, SWDIV  
Triss Chesney, DTSC  
Patricia Hannon, RWQCB  
Marcia Rudolph, RAB Subcommittee Chair  
Jerry Werner, RAB Co-Chair

Rec'd  
8/20/02

**Comments on  
Draft Final Construction Quality Control Plan and Draft Final Contingency Plan  
Remedial Action Operable Unit 2B Landfill Sites 2 and 17  
Marine Corps Air Station El Toro, California  
July 2002**

**GENERAL COMMENTS on Draft Final Construction Quality Control Plan**

1. The Construction Quality Control Plan (CQCP) does not address surveying. As surveying is likely to be a critically important quality control (QC) check for construction of the landfills, the CQCP should be revised to address surveying requirements for the project.
2. The CQCP does not include a table of acceptable values against which the QC test results can be compared. Please provide such a table or a specific reference to these values in the project specifications.
3. Quality control procedures implemented by the construction contractor should be independent of QC procedures implemented by the Navy. Please clarify the CQCP to indicate that the independent QC function will be conducted by a party not related to the contractor.
4. Please provide procedures for identifying and segregating any hazardous wastes that may be present in the waste to be consolidated.

**GENERAL COMMENTS on Draft Final Contingency Plan**

1. Please assure that personnel trained in identifying ordnance are present during all waste consolidation operations

**SPECIFIC COMMENTS on Draft Final Contingency Plan**

1. **Section 3.3.1 Hazardous Materials, Page 3-1:** There is the possibility that radio active materials will be encountered. Please list radioactive materials as potential hazards.
2. **Section 3.3.1 Hazardous Materials, Page 3-1:** The list of hazards appears to be mainly concerned with acute hazards. There should also be a concern associated with exposure to hazardous substances, such as carcinogens. Please revise the Contingency Plan to address exposure to such hazardous substances.
3. **Section 3.4.3 Response to Personal Injury, Emergency Contacts List, Page 3-4:** The phone number for Nicole Moutoux should be (415) 972-3012.