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MCAS EL TORO
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Gray Davis
Governor

June 26, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
Base Realignment and Closure
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FEDERAL AGENCY-TO-AGENCY PROPERTY TRANSFER, ENVIRONMENTAL SUMMARY DOCUMENT FOR CERTAIN PROPERTY, MARINE CORPS AIR STATION (MCAS), EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) appreciates the opportunity to review the summary document. DTSC also coordinated review of the document with the California Integrated Waste Management Board (CIWMB) and the Department of Health Services (DHS). The comments from each agency are presented in this letter. The document summarizes the environmental condition of a parcel of property to be transferred from the Department of the Navy (DON) to the Federal Aviation Administration (FAA). The parcel consists of approximately 901 acres in the northeast portion of the station.

DTSC Comments

After review of the document, DTSC has the following comments.

1. The first occurrence of an acronym should be defined. For example, on page 2, SARA, the NCP, and RCRA were not defined previously in the document. This should be checked throughout the document.
2. Page 4, first complete paragraph: This paragraph states, ". . . it has been determined that the Parcel is currently Area Type 1 with the exception of the following areas: . . ."

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For clarity and consistency, it is recommended that this list function as a summary of the areas described in detail in the remaining portion of Section 6.0. It would also be helpful to present detailed descriptions of each area in the same order as the summary list.

3. Page 11, Section 8.0 - Enforcement Agreements: According to the *DON Environmental Policy Memorandum 95-01: Environmental Requirements for Federal Agency-to-Agency Property Transfer at BRAC [Base Realignment and Closure] Installations*, a summary of the requirements of the Federal Facility Agreement relating to the property should be provided.
4. Page 11, Section 9.0 - Responsibility for Existing or Future Environmental Restoration: This section does not address future environmental restoration of underground storage tank (UST) 568, oil/water separator (OWS) 806 and the abandoned oil exploration wells described in Section 6.0.
5. Attachment (2): The delineation of the parcel to be transferred to the FAA is not clear in the vicinity of Site 1. It is suggested that the red boundary that delineates the parcel to be transferred to the FAA be completed around Site 1.

CIWMB Comments

After review of the document, the CIWMB has the following comments.

1. Page 10, Section 7.0 - Recommended Notifications and Restrictions: The last paragraph states, "Institutional controls shall also be used to ensure that the DON and FFA signatories have the right to enter and inspect the property" Please include "the CIWMB and/or its local enforcement agency" after the "FFA [Federal Facility Agreement] signatories."
2. Page 11, Section 9.0 - Responsibility for Existing or Future Environmental Restoration: The second bulleted item states, "The FAA shall permit access to the Parcel by DON and the Federal Facility Agreement (FFA) Signatories (USEPA, DTSC and the RWQCB). Access shall be permitted to allow the DON and FFA Signatories to conduct" Please include "the CIWMB and/or its local enforcement agency" after each occurrence of the "FFA signatories."

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DHS Comments

After review of the document, DHS has the following comment.

1. Page 7, Section 6.0 - Environmental Condition of Property: The third paragraph on this page states, "The DON will also be performing a radiological survey of Sites 2 and 17 in the fall of 2000." The survey is being conducted since equipment painted with radium paint, or other low-level radiological materials consistent with Station operations, could have been disposed into Sites 2 and 17 (Refer to pages 5 and 6 in the document).

Radiological surveys with instruments will only detect radioactive sources or contamination near the surface being surveyed. Contamination at depth would need to be monitored by sample collection. Generally, radiological surveys on the surface of a landfill cannot be used to determine whether or not the landfill contains radioactive materials and they do not justify reduction of institutional controls such as those specified on Page 7. Similarly, an absence of long-lived radionuclides above background levels in groundwater collected from monitoring wells located around or in a landfill generally does not justify discontinuation of groundwater monitoring, since the radionuclides may migrate at a later date.

Thank you for the opportunity for DTSC, CIWMB and DHS to review and provide comments on the environmental summary document for federal agency-to-agency property transfer. If you have any questions, please contact me at (714) 484-5395.

Sincerely,



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cc: See next page.

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