



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

M60050_003667
MCAS EL TORO
SSIC NO. 5090.3.C

November 6, 2003

Mr. F. Andrew Piszkin
BRAC Environmental Coordinator
Base Realignment and Closure
Marine Corps Air Station, El Toro
7040 Trabuco Road
Irvine, CA 92618

RE: Comments on Draft Final Finding of Suitability to Lease (FOSL), Former Marine Corps Air Station, El Toro, CA, October 2003

Dear Mr. Piszkin:

EPA has completed its review of the Draft Final Finding of Suitability to Lease (FOSL) which we received on October 22, 2003. This draft incorporated comments made by regulators on the draft FOSL.

We found the draft final FOSL an improvement to the draft FOSL in the way that information is organized and presented. We have attached comments which address a few areas where inconsistencies or omissions were found.

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

Sincerely,

Nicole Moutoux
Project Manager
Federal Facilities Cleanup Branch

cc: Kyle Olewnik, SWDIV
John Broderick, RWQCB
Rafat Abbasi, DTSC
Content Arnold, SWDIV
Thelma Estrada, EPA
Bob Woodings, RAB Community Co-Chair
Marcia Rudolph, RAB Subcommittee Co-chair
Daniel Jung, City of Irvine

received
11/19/03

**EPA Comments on Draft Final Finding of Suitability
Former MCAS El Toro
Dated October, 2003**

General Comments:

1. While we understand that the Navy issued the draft final FOSL prior to issuing the draft final FOST in the interest of saving time, it is important that these two documents be reviewed together. Since the Navy is making considerable changes to the draft FOST, we recommend that the FOSL and FOST should be finalized at the same time so that the agencies can view the revised versions together prior to finalization.
2. Please note that while we do not have comments on the actual restrictions in Attachment 2, these provisions were taken directly from MCAS Tustin documents and still contain references to Tustin and not El Toro. For example, Attachment 2 references the FFSRA which was signed for Tustin, as opposed to the FFA for El Toro. Please make all appropriate changes.

Specific Comments:

1. Section 4.1.3.1, Site 3-Original Landfill: In the third paragraph of this section, there is a discussion of results of the tech memo. Since the tech memo has not been finalized and outstanding issues exist, it is not appropriate to discuss the results such that it appears that the entire BCT agrees with the results. Please revise.
2. Section 4.1.3.13, Site 16-Crash Crew Pit No.2: For consistency, the ECP area type of this site should be presented in the text as it is for all other sites.
3. Section 5.3, Installation Restoration Program Sites, Notifications and Restrictions: Both of these sections reference restrictions needed for the on-site portion of the Site 2 plume. However, neither Table 7 nor Figure 5a have any information about this carve-out area (II-X). Information about this carve-out should be in Table 5 as well as shown on figure 5a or b.