

ADMIN RECORD  
ET

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

West Broadway, Suite 425

Beach, CA 90802-4444

(714) 590-4858



M60050\_004062  
MCAS EL TORO  
SSIC NO. 5090.3.A

February 20, 1996

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

Dear Mr. Joyce:

COMMENTS ON DRAFT FINAL COMMUNITY RELATIONS PLAN, MARINE CORPS AIR STATION (MCAS)  
EL TORO

The Department of Toxic Substances Control (DTSC) has reviewed the above subject document delivered under transmittal dated December 28, 1995. This document was received by DTSC on January 8, 1996. According to the Federal Facility Act, the CRP is a primary document with a 60 day review time. This letter transmits the enclosed DTSC comments dated February 16, 1996 within the 60 day time period.

If you have any questions, please contact 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



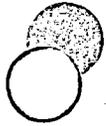


Mr. Joseph Joyce  
February 15, 1996  
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cc: Mr. Lawrence Vitale  
Remedial Project Manager  
California Regional Water Quality Control Board  
Santa Ana Region  
2010 Iowa Avenue, Suite 100  
Riverside, California 92507-2409

Ms. Marsha Mingay  
Public Participation Specialist  
Department of Toxic Substances Control  
245 West Broadway, Suite 350  
Long Beach, California 90802-4444

Mr. Vish Parpiani  
Environmental and Safety  
Marine Corps Air Station-El Toro  
P. O. Box 95001  
Santa Ana, California 92709



## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4  
45 West Broadway, Suite 425  
Long Beach, CA 90802-4444



## M E M O R A N D U M

TO: Tayseer Mahmoud  
Project Manager

FROM: Marsha Mingay *mm*  
Public Participation Specialist

DATE: 16 February 1996

SUBJECT: COMMENTS ON EL TORO'S DRAFT FINAL COMMUNITY RELATIONS  
PLAN

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Thank you for the opportunity to review the above referenced document on behalf of the Department of Toxic Substances Control and in compliance with the Federal Facility Agreement #91-2. Please review the comments and forward same to Mr. Joseph Joyce, BEC, before February 20, 1996.

If you have any questions regarding this information, please contact me directly at (310) 590-4881.

## GENERAL COMMENTS:

The document adequately reflects the information shared during the community interviews. However, additional information should be included to provide the reader with a complete understanding of:

*resources available to them* (DTSC added as a point of contact in the Introduction section (page 1-1); and our Public Participation Policy and Procedure Manual added to Section 5)

*roles and responsibilities for each agency involved* (will require additional information for Section 4.3)

*the legal document which defines our working relationship* (new section to be added)

*the guidance used in establishing the CRP* (new section to be added)

Mr. Tayseer Mahmoud  
February 16, 1996  
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To incorporate this information into the CRP, create new sections for:

**Federal Facilities Agreement**

Since this document provides a fundamental working basis for all team members, a summary of its content will educate the reader of its existence and content (see Example 1).

**Guidance Used for this CRP**

To enhance the public's credibility of the CRP, this section would clearly state that the CRP meets all of the applicable federal and state regulations and guidance for establishing a community relations plan (see Example 2).

To assist the military's incorporation of this material, examples of each topic area are attached to this memorandum.

Public Participation has also reviewed the Restoration Advisory Board member's comments on the CRP. Based upon that review, we will request a meeting to discuss with Mr. Joseph Joyce and applicable personnel, the comments received and their resolution. All valid comments received should be incorporated in the final document. Some of these will require a lengthy preparation time, and should be started early. Examples are:

recognize and incorporate information on all neighboring communities and unincorporated areas, such as Foothill Ranch, Potola Hills, Woodbridge and Northridge

on the maps provided, indicate the major streets and jurisdictional boundaries of adjacent cities

**SPECIFIC COMMENTS ON EXISTING INFORMATION**

**Section 1**

Introduction, page 1-1

Paragraph 2, sentence 2, this sentence needs to be modified to accurately describe the regulatory relationships of the Marine Corps/Navy, U.S. EPA and the state as described in the Federal Facility Agreement. The following wording more

Mr. Tayseer Mahmoud  
February 16, 1996  
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accurately reflects this relationship. (Substitute the following two sentences for the second sentence in paragraph 2, page 1-1):

The U.S. Environmental Protection Agency (USEPA) Region 9 and the State of California are signatories to a Federal Facility Agreement with the Navy. As such, U.S. EPA and Department of Toxic Substances Control (DTSC) for the state, provide guidance and oversight for this program.

Also, one additional contact needs to be added to the list in the middle of page 1-1:

Ms. Marsha Mingay  
Public Participation Specialist  
Department of Toxic Substances Control  
245 W. Broadway, Suite 350  
Long Beach, California 90802  
(310) 590-4881

Section 2.2.1.1  
Environmental, page 2-2

Quantify the number of community members who stated that they do "not have sufficient information to know if other environmental concerns may exist or if current waste management practices are more responsible than past practices." (see 2nd paragraph, page 2-2)

Section 2.2.1.3  
Communication and Involvement, page 2-3

According to your introductory paragraph, "... among the interviewees there was a contrasting range in the level of interest ...". The second paragraph characterizes one view expressed, namely that of confidence in the Marine Corps/Navy. To provide the reader with a balanced view of the comments received, provide additional information describing the contrasting view which was expressed, namely low confidence. As an alternative suggestion, the second paragraph could be deleted since the discussion on the level of confidence and credibility is presented in Section 2.2.1.5.

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Section 2.2.1.4  
Restoration Advisory Board, page 2-4

1st paragraph:

Clarify that **one** agency felt that the RAB "... is not considered an effective forum for local regulatory agencies to provide feedback to the Marine Corps/Navy, nor facilitate technical discussion at a regulatory level.

Section 2.2.1.5  
Level of Confidence in Marine Corps/Navy, page 2-5

To increase clarity, substitute the pronoun "they" with the proper noun, "Marine Corps/Navy" (see 1st paragraph, 2nd sentence). The sentence would read, "Approximately one quarter of the interviewees stated that their low confidence in the military stems from the military's historic lack of openness and a belief that the Marine Corps/Navy is currently not interested in cleaning up the environment."

Section 3.1.2  
Public Participation Requirements for Removal Actions, page 3-2

According to information shared during the recent BCT meetings, the seven EE/CAs currently being reviewed do not fit within the three main characteristics listed in this first paragraph. Specifically, the EE/CAs were initiated before the site investigations were concluded. Please correct the paragraph accordingly.

Table 3-1  
Timing and Overview of Community Relations Activities for Remedial Response Actions,  
page 3-4

Correct the table to reflect, EPA's Community Relations Handbook, Exhibit 2-1, which reads that a 30-day public comment period, a public meeting (with transcript) and a responsiveness summary must accompany the RI/FS and Proposed Plan.

A CRP revision is required after the signing of the Record of Decision (ROD) and before the implementation of remedial activities. To better reflect this requirement, move the check mark to the Completion of the ROD column.

Mr. Tayseer Mahmoud  
February 16, 1996  
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Table 3-2

Timing and Overview of Community Relations Activities for Removal Actions, page 3-5

To clarify the requirements, expand the heading, "Provide 30-day comment period" to inform the reader what mechanism is used (e.g, Provide 30-day comment period and publish notice).

3.2.2.1

Restoration Advisory Board, page 3-7

Expand the last sentence in the first paragraph to include the information printed in boldface italics below, "To meet the President's requirements, MCAS El Toro initiated and continues to support the RAB *as described in the joint DoD and U.S. EPA Restoration Advisory Board Implementation Guidelines* (DoD and U.S. EPA 1994)."

Change information in the paragraph (see page 3-8) to reflect the new RAB meeting starting time of 6:30 p.m.

Section 3.2.2.5

Administrative Record File, page 3-9

Following the format for Section 2.3.1.2 on information repositories, include the location of the Administrative Record.

Section 3.2.3.2

Evaluation of Community Relations Activities, page 3-11

DTSC may evaluate the effectiveness of the community relations activities and therefore DTSC should be included in this section. Please add the following words (written in boldface italics below) into the existing sentence which reads, "The lead regulatory agency, the U.S. EPA, *as well as the State of California, Department of Toxic Substances Control* may evaluate activities for their effectiveness."

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Section 4.3  
Agency Coordination and Oversight, page 4-4

This section currently states the role of the U.S. Marine Corp; however the roles and responsibilities of the regulatory agencies are not included. This information is necessary to educate the reader on the roles and responsibilities for each of the team members (see Example 3, Agency Coordination and Oversight, 2nd paragraph; and Example 4, Implementation Responsibility).

Section 5  
References

Include in this listing, the DTSC's Public Participation Policy and Procedure Manual (document number EO-94-002-PP, printed July 1994).

Appendix B  
Marine Corps/Navy and Regulatory Agency Contacts

Reflect the change of DTSC's Project Manager from Juan Jimenez to Tayseer Mahmoud. Mr. Mahmoud's telephone number is, (310) 590-4891.

cc: Claire Best  
Public Participation Supervisor  
Office of Military Facilities  
Region 4

John Scandura, Chief  
Office of Military Facilities  
Region 4

# EXAMPLE 1

## 1.4 Federal Facility Agreement

MCB Camp Pendleton was listed on the federal NPL by EPA on November 15, 1989. A Federal Facilities Agreement (FFA) was negotiated and agreed upon by EPA, DHS, the RWQCB, the Navy and Marine Corps. A public review draft of the FFA was formally signed on October 24, 1990. The FFA outlines the working relationship between DHS, EPA and the Navy and clearly lays out mutual obligation of the parties to the agreement in implementing Superfund activities at MCB Camp Pendleton. It is structured to avoid excessive reporting, duplication of effort, and reduce the administrative practices that create efficiency for the overall remedial response.

## EXAMPLE 2

### 1.3 Guidance Used for this CRP

This CRP meets all of the applicable federal and state of California regulations and guidance for establishing a community relations plan. Relevant federal guidelines include the *U.S. Environmental Protection Agency's Community Relations in Superfund: A Handbook* (EPA Directive 9230.0-03C, January 1992), the *Navy/Marine Corps Installation Restoration Manual* (Chief of Naval Operations, February 1992) and the *Installation Restoration Public Affairs Plan* (Department of the Navy, Office of Information, Washington, DC, 26 January 1989). State guidance consisted primarily of the *State of California Environmental Protection Agency, Department of Toxic Substances Control, Public Participation Office's Public Participation and Guidance Manual* (1989). Also, information obtained from the files of the MCLB Barstow Public Affairs Office and Jacobs Engineering Group Inc., the Base's contractor for the initial investigative phase of the IRP, assisted in the development of background information. All 1990 interviews were conducted during the months of February and March. Some interviews were conducted over the phone, though most were held in person. All 1994 interviews were conducted in person over a two-day period in June 1994. Supplemental interviews, in response to regulatory agency comments, were held in August and September 1995.

# EXAMPLE 3

CLEAN II  
CTO-0063/0196  
Date: 12/15/95

## Section 4 Site Descriptions and Investigations

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### 4.3 AGENCY COORDINATION AND OVERSIGHT

The Department of Defense (DoD) is the lead federal agency responsible for conducting the investigation and implementing the final cleanup plans at MCAS Tustin. The investigation and cleanup are being conducted according to guidelines established for the base IRP. The guidelines follow the requirements of the National Contingency Plan, in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendments and Reauthorization Act, administered by the U.S. Environmental Protection Agency (U.S. EPA).

The California Environmental Protection Agency's (Cal-EPA's) Department of Toxic Substances Control (DTSC) is the lead state agency responsible for reviewing and approving all proposed work plans, and for overseeing the investigation and cleanup. The U.S. EPA and the Regional Water Quality Control Board also participate in a review and oversight role.

With fast-track cleanup activities under way and the decision to close MCAS Tustin no later than June 1999, the DoD has formed a multiagency team to coordinate environmental cleanup programs that will both protect the environment and human health, and expedite the closure and reuse of MCAS Tustin. This Base Realignment and Closure Cleanup Team serves as the primary forum for assessing cleanup progress, obtaining consensus on problem issues, and eliminating confusion regarding the base's environmental activities. Marine Corps/Navy representatives have joined with the DTSC and U.S. EPA to make up this core team.

# EXAMPLE 4

CTO260\B30021\DRAFT2

CLE-J02-01F260-B3-0021

Print Date: *October 25, 1995*

Version: Draft Final

Revision: 0

## 2.3 Implementation Responsibility

The Navy is the U.S. Department of Defense (DoD) authority responsible for conducting the site investigation and cleanup at MCLB Barstow. The Navy's remedial effort is being conducted in conjunction with the EPA, the Lahontan Regional Water Quality Control Board (Water Board), and the State of California Environmental Protection Agency's Department of Toxic Substances Control (DTSC).

The EPA is the lead agency for the site investigation and cleanup, and reviews all technical documents to ensure the IRP is properly conducted. The Water Board operates as the regional authority for the State Water Quality Control Board to protect and oversee the waters of the state of California. The DTSC is charged with protecting the health of the residents of the state of California and has the authority by law to serve as lead agency in the EPA's absence.

All agencies listed are actively participating in MCLB Barstow's IRP by reviewing and commenting on all technical reports prepared regarding site investigation and cleanup. They are also all participants on the Technical Review Committee (TRC) discussed later in this CRP.