



Cal/EPA

Department of
Toxic Substances
Control

245 West Broadway,
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Long Beach, CA
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January 26, 1998

ADAMS RECORD
M60050_004266
MCAS EL TORO
SSIC NO. 5090.3.A



Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

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 BASE REALIGNMENT AND CLOSURE (BRAC)
CLEANUP PLAN, MARINE CORPS AIR STATION (MCAS) EL TORO**

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated January 1998. The report revises the March 1997 BRAC Cleanup Plan (BCP) for MCAS El Toro.

This letter is to transmit the enclosed DTSC comments on the draft BCP. If you have any questions, please call me at (562) 590-4891.

Sincerely,

Tayseer Mahmoud
Remedial Project Manager
Base Closure Unit
Office of Military Facilities
Southern California Operations

Enclosure

cc: See next page.

Mr. Joseph Joyce
January 26, 1998
Page 2

cc: Mr. Glenn Kistner, SFD-8-2
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DEPARTMENT OF TOXIC SUBSTANCES CONTROL
Comments on Draft BRAC Cleanup Plan
Marine Corps Air Station El Toro
Dated January 1998

The comments below were prepared by Mr. Tayseer Mahmoud, Remedial Project Manager, and Mr. Aaron Yue, Environmental Assessment and Reuse Specialist from the Department of Toxic Substances Control. Overall, the plan is well written and thorough. A few clarifications and modifications are needed as outlined in the comments below. Please incorporate the comments where appropriate.

GENERAL COMMENTS

1. Staff provided verbal comments during the BCP meeting held on January 21, 1998. Comments which pertained to formatting, typographical, or grammatical errors will not be repeated in this letter.
2. The draft BCP references some figures in each Chapter, but the figures are not provided. Please provide the figures mentioned in the documents.

SPECIFIC COMMENTS

1. **Executive Summary, Installation Restoration Program, page ES-6**

Please update the Status of OU-2B and OU-2C Feasibility Study Reports that were approved in November 1997.

2. **Executive Summary, Compliance Program Sites and Other LOCs, Exhibit ES-4, ES-5 and ES-6, page ES-8**

Please provide an explanation in the Executive Summary as to why the number of active Temporary Accumulation areas has increased from last year. Also, please clarify the changes in numbers from those reported last year for both PCB transformers and Oil/Water separators. Were these removed?

3. Executive Summary, Initiative for Accelerated Cleanup, Section 3, page ES-9

Please replace the term "CERFA-eligible" with "Environmental Condition of Property, Category 1" when describing properties where no release of hazardous substances has occurred, and with the term "eligible for transfer" for properties that fall under ECP categories 2-4. Also, please reconcile the differences in acreage reported in this section with the numbers reported on page 2-4, page 3-3, and Table 3-16.

4. Chapter 3, Section 3.1.2.2, Features of Potential Environmental Concern, page 3-11

The beginning of the last paragraph states that a former employee reported that mercury had leaked at the two water towers. However, the last sentence concluded that no reported mercury leaks are associated with the removal of the towers. Please provide more details to support this conclusion and to explain this apparent contradiction. Was soil sampling conducted?

5. Chapter 3, Section 3.2.4.3, Non-Transformer PCB Items, page 3-21

The last paragraph of this section states that ballasts in fluorescent light fixtures may contain PCBs, but a survey is not scheduled to be performed as part of base closure. Please indicate whether or not this information will be provided to the transferee via any real estate documents at time of transfer.

6. Chapter 3, Section 3.2.5, Asbestos, page 3-23

This section mentioned that only 54% of 506 buildings were inspected during the asbestos survey, and the results are provided in Table 3-11. The BCP, however, did not make any statements regarding the other 46% of the buildings. What is the proposed action by the Marines regarding the other buildings?

The last sentence of this section indicates that "none of the ACM is considered to be a threat to human health." How did the Marines come to this conclusion? What basis is used for this determination? Are the buildings not accessible, or are they proposed for demolition, or is the asbestos non-friable? Please clarify the rationale for the conclusion.

7. Chapter 3, Section 3.2.9, Oil Water Separators, page 3-32, 1st paragraph

Please revise the 5th & 6th sentence to read as follows: "...Under tiered permitting state regulations, some treatment units (e.g., OWSs) are regulated as 'Conditionally Exempt'. The revised regulations became effective in January 1993; etc."

8. Chapter 3, Exhibit 3-8, page 3-37

The acreages listed in last year's table are identical to all columns of this exhibit except for "Croplands." Last year, this column was labeled "Vineyard and Orchards" and contains 44.8 acres. This year, the column is relabeled as "Croplands" and is described to contain 587.8 acres. That's a difference of 543 acres. Please reconcile the difference in acreage. Which is accurate?

9. Chapter 3, Section 3.4.8, page 3-45

The total acreage of property eligible for transfer is inconsistent. See comment #3 above.

10. Chapter 3, Sections 3.5.10 and 3.5.11, page 3-51

Please add references to Section 3.5.10, Federal Facility Agreement and Section 3.5.11, Environmental Impact Statement Process, which are missing.

11. Chapter 3, Table 3-12

The number of SWMUs/AOCs has been changed from last year's BCP update. Please provide an explanation in the Executive Summary as to why the numbers have changed.

12. Chapter 4, Section 4.2.4.2, PCB Storage Area, page 4-11

Please update the status of Site 11 (Transformer Storage Yard).

13. Chapter 4, Section 4.2.11, Lead-Based Paint, page 4-15

Currently, a disagreement still exists between the Marines and the regulatory agencies regarding sampling for Lead-Based Paint. As a signatory to the BCP, the State must also include language in the BCP which reflects our position regarding Lead-Based Paint. We propose the following paragraph be inserted in this section of the BCP.

“Currently, the regulators and the Marines disagree on the extent of lead investigation necessary at closing military facilities. U.S. EPA and DTSC maintain that lead in soil due to Lead-Based Paint is considered to be a CERCLA release. Although the U.S. EPA and DTSC disagree on the project-specific action level for lead, both agencies are adamant that soil screening for lead at various locations on MCAS El Toro is required prior to transferring property to the LRA.”

14. Chapter 5, Section 5.1, Environmental Restoration Program

Please update Figure 5-1, the Master Program Schedule for the Installation Restoration Program.