



MCAS EL TORO LOCAL REDEVELOPMENT AUTHORITY • Janice M. Mittermeier, Executive Director
MCAS EL TORO MASTER DEVELOPMENT PROGRAM • Courtney C. Wiercioch, Manager

January 26, 1998

Joseph Joyce
BRAC Environmental Coordinator
MCAS El Toro
P.O. Box 95001
Santa Ana, CA 92709-5001

Re: *Draft Base Realignment and Closure Cleanup Plan (BCP) For Marine Corps Air Station El Toro, CA, January 1998*

Dear Mr. Joyce:

As requested by memorandum dated January 7, 1998, the County of Orange has conducted an expedited review of the "Draft Base Realignment and Closure Cleanup Plan (BCP) For Marine Corps Air Station El Toro, CA ("MCAS El Toro"), January 1998" ("January 1998 Draft BCP"). This letter constitutes the County's comments on the draft document.

The County's review of the January 1998 Draft BCP has resulted principally in questions. These questions, with our suggestions for appropriate clarification, are set forth below. However, the County's review also generated concern with respect to the level of cleanup to be conducted at the MCAS El Toro site. This concern arises from the draft document's emphasis on an accelerated cleanup, without corresponding assurances that the cleanup will be conducted with the utmost concern for public health and safety, in strict compliance with applicable rules and regulations, and consistent with the base reuse plan. (See, Initiatives for Accelerating Cleanup [pages ES-9 through ES-12]; Section 6.6, Basewide Remedial Action Strategy [pages 6-7 through 6-8]; Section 6.12, Initiatives For Accelerating Cleanup [pages 6-11 through 6-12]; and Section 6.20, Bias For Cleanup Instead of Studies [pages 6-16 through 6-17].) Because the County's primary concern is public health and safety (as we are sure is also the case with the Navy), the County suggests that the draft document be revised in a manner which assures the public, and the County as the Local Redevelopment Authority ("LRA"), that the level of cleanup of MCAS El Toro will not be compromised in order to meet the July 1999 deadline.



received
2/5/98

The following questions are directed towards specific sections of the January 1998 Draft BCP, with suggestions for clarification, as appropriate:

Section 3.1.1, Restoration Sites. The cleanup status of certain Locations of Concern ("LOCs") has been adjusted as a result of the CERCLA "petroleum exclusion." See, *e.g.*, page 3-5, "Portions of the following three IRP sites were formerly part of OU-3, and have been withdrawn from the IRP via the CERCLA petroleum exclusion...." The draft document, however, does not discuss the substitute cleanup activities to be undertaken. We suggest that clarification of this issue be provided. See also, Section 6.6, Basewide Remedial Action Strategy (pages 6-7 through 6-8), and Section 6.12, Initiatives For Accelerating Cleanup (pages 6-11 through 6-12).

Section 3.2.1.3, Fuel Supply Pipelines. The draft document states that "[a]ny contamination resulting from the past or present operation of the pipeline will be addressed by DFSC [Defense Fuel Supply Center]." (Page 3-15.) Assuming "addressed" means responsibility for cleanup, no citation to authority or further discussion of this statement is provided. The County suggests that either additional discussion be added in support of such statement, or, that a citation to the relevant document(s) be provided. Additionally, the section contains no discussion as to the status of the on-Station fuel lines, *i.e.*, whether the fuel lines have leaked resulting in contamination.

Table ES-1, BCT Project Team Action Items. "Table ES-1 provides a list of recommendations and issues associated with the environmental restoration and compliance that require further evaluation and action by the BCT." (Page ES-13.) The Table does not, however, address the IRP sites. While schedules for the investigation and remediation of all the IRP sites are specified in the FFA, the general status of the IRP sites should be included in Table ES-1.

Section 3.1.1, Restoration Sites. The draft document states that the draft Proposed Plan for OU-2C was submitted to the regulatory agencies in September 1998. (Page 3-8.) The 1998 date is an apparent error.

Section 3.1.2.2, Features of Potential Environmental Concern Identified in Personnel Interviews. The draft document states that "[i]nterviews with current and former MCAS El Toro personnel were conducted on 26 May 1994... to obtain additional information regarding past hazardous substance management practices, activities, and potential releases at the Station." (Page 3-10.) Assuming the listing of one day is not a typographical error, this seems an insufficient amount of time

to devote to such an important subject. The County suggests that further discussion be added explaining the basis for conducting only one day of interviews.

Section 3.1.2.2 further states that "a former Station employee reported that mercury leaks occurred at the two elevated water towers formerly located in the northwest portion of the Station." (Page 3-11.) The Section further states that "[t]here were no reported mercury leaks associated with the removal of the towers," but does not state whether the soil beneath the water towers was ever tested for mercury. Further discussion should be provided.

Section 3.2.1.2, Aboveground Storage Tanks. The draft document does not address the status of the ASTs, *i.e.*, there is no discussion as to whether any of the above ground tanks have leaked in the past and, if so, whether such leaks have resulted in soil or groundwater contamination. (Page 3-14.) Suggest providing further discussion.

Section 3.2.4.2, PCB Transformers and Equipment Storage Areas. The draft document states that soil samples were collected from a former transformer storage area (Database Tracking No. RFA 7), but fails to state what the results of the samples were (page 3-20). Similarly, a PCB containing transformer was stored in another area (Database Tracking No. PCB A1), although the section does not state whether there was/is any contamination resulting from the storage. (*Id.*) The County suggests that further discussion be provided.

Section 3.2.5, Asbestos. The draft document states that "approximately 54 percent (273 buildings) of these 506 [non-residential] buildings at MCAS El Toro were inspected" for asbestos containing materials. (Page 3-22.) The BCP should include a discussion of actions which have been taken to revalidate the information included in past inventories. The LRA requests copies of the Draft Asbestos Management Plan and Draft Asbestos Operating Plan as referenced on Page 3-22. Asbestos containing materials ("ACM") were identified in 164 of the 273 buildings, and of the 164 buildings, 52 contained "friable" ACM which is "ACM that is easily pulverized (*e.g.*, with light contact) and thus can become airborne, making it a human-health hazard." (Page 3-23.) Section 3.2.5 does not state whether ACM surveys will be, or have been, conducted of the remaining 233 non-residential buildings. The County requests that a survey be completed for the remaining 233 buildings on the base, as well as a full survey of utility lines and conduits. It is our understanding that utility lines/conduits on the base may contain asbestos-containing materials as well as lead wiring. Page 3-23 states that DON will take corrective actions for friable asbestos in buildings having staff or public

access prior to closure. The BCP should include a list of buildings where corrective action will not be taken because they are not considered to have staff or public access.

Section 3.2.6, Radon. The draft document states that "[s]tation building records indicate that radium paint was used previously in Building 296," implies that radium paint may have been used in Building 297 as well, and states that "information on waste management associated with radium painting activities is not available." (Page 3-24.) Section 3.2.6 does not, however, state that any follow-up action will be taken, *e.g.*, that specific evaluations of the building sites will be conducted for the presence of radium. Will follow-up action be taken? See also, Section 4.2.6, Radon, "Radium paint has been used in the past in Building 296. Waste associated with radium paint use in this building may have been disposed in one of the Station landfills. The radon survey did not include Building 296." (Page 4-12.)

Section 3.4.8, Suitability of Installation Property for Transfer by Deed. This section is confusing. On the one hand, the section states that U.S. EPA and Cal-EPA agree that "3,992 acres of MCAS El Toro is CERFA uncontaminated," *i.e.*, "Area Type 1", yet the section later states that "[b]ased on information compiled for the preparation of this BCP, area type 1 land currently totals 3,209 acres." It is crucial that uncontaminated property be carefully and specifically identified. The County suggests that a discussion explaining the discrepancy in the two numbers be provided.

Section 4.2.7, RCRA Facilities (SWMUs). Following discussion of the number of SWMUs/AOCs, the draft document provides "a summary of the remaining 41 SWMUs/AOCs." (Page 4-12.) It is, however, unclear how the number 41 was arrived at. Of the 287 SWMUs/AOCs identified, 247 have been recommended for no further action. This leaves 40 SWMUs/AOCs remaining, minus the one SWMU/AOC not located, or 39. Moreover, Section 4.2.7 actually addresses 52 SWMUs/AOCs. The County suggests that this apparent discrepancy be clarified.

Section 4.3.1, Archaeological Resources. The reference to "seven" sites identified in the 1987 report is an apparent typographical error and should be changed to the number "ten." (Page 4-15.) See, Section 3.3.4, Archaeological Resources.

Joseph Joyce
January 26, 1998
Page 5

Figure 5-1, Master Program Schedule MCAS El Toro Installation Restoration Program. The Key in the lower left corner is illegible. Additionally, pages 2, 4 and 5 are missing from the schedule.

In closing, the County recognizes that the environmental restoration of the MCAS El Toro site is a complex task and we appreciate the opportunity to review and comment on the January 1998 Draft BCP. The County looks forward to continuing its work with the Navy over the next eighteen months in order to bring this matter to a successful resolution.

Sincerely,



Courtney C. Wiercioch, Manager
MCAS El Toro Master Development Program

cc: Each Board Office
Janice Mittermeier, CEO