

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

22 September 2008

Marine Corps Air Station El Toro  
Base Realignment and Closure  
Attn: Ms. Debra Theroux  
Deputy Base Closure Manager  
7040 Trabuco Road  
Irvine, California 92618

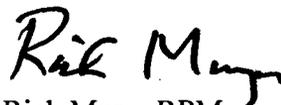
Subject: Draft Finding of Suitability to Transfer (FOST) #4  
Former Marine Corps Air Station, El Toro, California

Dear Ms. Theroux:

EPA has completed its review of the subject draft document dated August 2008. We offer the attached comments on the document for clarification in the draft final FOST.

If you should have any questions/concerns, please contact me at 415-972-3349.

Sincerely,



Rich Muza, RPM  
Superfund Division

cc. Content Arnold, NFECSW SDIEGO  
Quang Than, DTSC  
John Broderick, RWQCB  
Bob Woodings, RAB Co-Chair  
Marcia Rudolph, RAB Sub-Committee  
Thelma Estrada, ORC  
John Hamill, SFD

received  
9/29/08

## COMMENTS ON THE DRAFT FOST #4

1. GENERAL – The FOST does not address the following topics that are commonly covered in these property transfer documents: intended reuse of the carve-outs, proposed transferee for each carve-out, summary of NEPA issues, EBS category for carve-outs, and a listing of all detected contaminants. In particular, the absence of information regarding the intended re-use of the carve-outs is problematic as this information would have assisted EPA in determining what restrictions would be appropriate. For instance, Section 5.1.1, Carve-Out I-B states that there is a petroleum plume in this area. The Navy lists the restrictions on the next page; however, it is not clear from these restrictions whether buildings, if any, will be built on this property. If so, what kind? Residential? Industrial? The Base Redevelopment and Realignment Manual (BRRM), which is the current guidance for FOSTs being developed for the former MCAS El Toro, does not prohibit the information listed above from being provided to the regulators. Therefore, EPA recommends that the listed information be provided in the draft final submittal.

2. Page 12 -- For carve-out I-G, there is a statement that the groundwater is in the final stages of remediation and therefore poses no threat. What is meant by the phrase "in the final stages of remediation"? Does this mean that the pump and treat system is operating properly and successfully or that the plume has shrunk and the cleanup goal is close to being achieved? The statement here is vague and it is hard to assess whether in fact EPA can agree that there is no threat to future users of the property adjacent to the plume. In contrast, for carve-out III-D (also on this page), there is a statement that although there is a plume, this plume is approximately 100 feet below the land surface and therefore poses no threat to the future use of the adjacent carve out property. Based on this more specific statement, EPA can agree that there is no threat to human health despite the presence of the plume. It is recommended that further information be provided for carve-out I-G.