

Regulator Letters

To: Rick Solander@MCCLELLAN@AFBDA.DCM
From: <Healy.Joseph@epamail.epa.gov>
Cc: ISMTP@ADMIN@AFBDA.HDQ [<carr.robert@epamail.epa.gov>], Jay
McCain@MCCLELLAN@AFBDA.DCM
Subject: EPA RPM OK with language Re: FOST - Asbestos Language
Attachment: ASB PARA.DOC
Date: 4/30/2004 7:51 AM

I reviewed the attached and have no comments.

rick.solander@afropa.pentagon.af.mil (Rick Solander)
To: Joseph Healy/R9/USEPA/US@EPA
cc: Robert Carr/R9/USEPA/US@EPA,
jay.mccain@afropa.pentagon.af.mil (Jay McCain)
04/29/2004 05:13 PM Subject: FOST - Asbestos Lanaguage
Please respond to
rick.solander

Joe,

Just wanted to let you know that Bob Carr and Jay McCain have been working very closely over the last week to fine tune one of the paragraphs of the new asbestos language (paragraph in question attached). Bob Carr was O.K. with the language that is attached, but wanted to make sure you were O.K. also. Bob provided the comment, so I would think that you would be O.K as long as Bob is O.K., which he is. I tried to touch bases with you at the RPM meeting today, but you got away before I could talk to you.

I will not be in the office tomorrow, so I am moving forward with processing the package with the inserted language with the assumption that you are O.K. with it. If you have a question, please let Jay or Bob know.

Rick Solander
Environmental Scientist
AFRPA/DD-McClellan
(916) 643-0830 ext.228
email: rick.solander@afropa.pentagon.af.mil
----- Original Text -----

From: Jay McCain@MCCLELLAN@AFBDA.DCM, on 4/29/2004 8:32 AM:

To: ddn[carr.robert@epa.gov]
Cc: Rick Solander@MCCLELLAN@AFBDA.DCM

Bob - Here's what I came up with.

Jay McCain
3411 Olson St., Room 105
McClellan CA 95652-1003
(916) 643-6420, ext. 107; Fax - 0460
jay.mccain@afropa.pentagon.af.mil

(See attached file: ASB PARA.DOC)



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

March 26, 2004

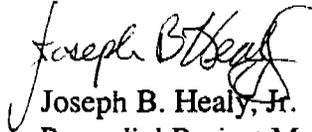
AFRPA/DD-McClellan
Attn: Paul Brunner, BEC
3411 Olson St.
McClellan, CA 95652-1071

Subject: EPA Comments (DSR #771-10) on Text Revision 3 for FOST: Parcels A1, A2, A3, A7, L1, & L3

Attached are comments from EPA's attorney (Bob Carr) on the Text Revision 3 for FOST: Parcels A1, A2, A3, A7, L1, & L3. I have reviewed these comments and am forwarding them to you as EPA's official comments on the subject document.

If you have any questions, please do not hesitate to call me at (415) 972-3269.

Sincerely,


Joseph B. Healy, Jr.
Remedial Project Manager

JBH/jbh

Attachment: Bob Carr's comments on subject document

cc: Kevin Depies, DTSC
James Taylor, RWQCB
Rick Solander, AFRPA-McClellan
Jay McCain, AFRPA-McClellan

Bob Carr's Comments
on the
Text Revision 3 for FOST: Parcels A1, A2, A3, A7, L1, & L3

EPA comments on Asbestos language for FOSTs and FOSETs

EPA has shared the issues/concerns described below with the Air Force and understands that the proposed language is being modified to address these issues. We are awaiting revised language which we believe we will be able to approve.

Text

ACM in Utility Pipelines: No CERCLA remedial action for ACM in below ground utility pipelines is required.

Comment

While this statement may be correct in most cases, it requires some explanation/basis because asbestos in utility lines can be in a variety of forms from transite pipe to steam line insulation which have very different properties.

Proposed modification: Add the phrase "so long as the utility line is not disturbed or removed from the ground."

Text

ACM in Demolition Debris: ACM, which was commonly used in building materials, may be located at building demolition locations. Based upon an inspection of the property and a review of the environmental baseline survey reports, no such locations are **specifically known at this base**. No CERCLA **remedial** action is required at this time. However, it is possible that there are undiscovered locations where demolition debris may be found by the property recipient or subsequent transferees during ground disturbance activities. The property recipient and subsequent transferees will be cautioned by notice in the deed to exercise care during ground disturbing activities. The property recipient or subsequent transferees will be required to notify the Air Force promptly of any demolition debris containing friable asbestos and believed to be associated with Air Force activities. The property recipients or subsequent transferees will be required to allow the Air Force a reasonable opportunity to investigate and, if a CERCLA **remedial** action is necessary, to accomplish it.

Comment

Is it correct to say that there are no building demolition sites at McClellan AFB? If the AF cannot make that statement what happens to the statement which follows?.

Proposed modification: "portion of the base which includes the parcel(s)"

In both cases the word "remedial" should be replaced with "response" since it is unlikely that demolition debris will even require a full-blown remedial action.

Text

The deed will also state that the Air Force will be responsible for conducting any CERCLA remedial action found to be necessary for hazardous substances released or disposed of on the property prior to the date of the deed, so long as the property recipient is not a potentially responsible party under CERCLA for the **pre-transfer** release or disposal.

Comment

Need to add the word "pre-transfer" since the Air Force only intends to respond to asbestos which constitutes a "release". The language both in the FOST and in the deed should distinguish between the action that put the asbestos in the ground e.g. building demolition, and the action which results in a post-transfer "release or threat of release" e.g. excavating or uncovering the asbestos.

proposed modification add the word "pre-transfer" or use language comparable to that included in the (h)(3) covenant limiting the AF responsibility where the action of the transferee releases a new hazardous substance giving rise to the need for a response action.

Robert Carr
415 972 3913
FAX 415 947 3570/71

To: Rick Solander@MCCLELLAN@AFBDA.DCM
From: "Francesca D'Onofrio" <FDonofri@dtsc.ca.gov>
Cc: ISMTP@ADMIN@AFBDA.HDQ["Kevin Depies" <KDepies@dtsc.ca.gov>]
Subject: Final Revised Asbestor Language
Attachment:
Date: 4/5/2004 3:13 PM

Hello Rick,

After my review, and with a nod of agreement from management, DTSC has no comments on the revised language and is in agreement with the language. A signed letter will be sent to you stating our position but I wanted to let you know via e-mail as soon as I was able to.

To: Rick Solander@MCCLELLAN@AFBDA.DCM
From: "Kevin Depies" <KDepies@dtsc.ca.gov>
Cc:
Subject: respond to your vm
Attachment:
Date: 01/15/2003 11:35 AM

Hi Rick.

The discussion regarding property transfer and radiation issues does not apply to the Cat 1 FOST. We are operating under the assumption that this parcel should not have any radiation concern. The rest of the base is where we currently have a problem

hope this answers your question

Kevin Depies
CA Dept. of Toxic Substances Control
Ph: 916-255-3688
Fax: 916-255-3734

From: "Kevin Depies" <KDepies@dtsc.ca.gov>, on 09/25/2002 11:00 AM:
To: Rick Solander@MCCLELLAN@AFBDA.DCM
Cc: ISMTP@ADMIN@AFBDA.HDQ["Francesca D'Onofrio" <FDonofri@dtsc.ca.gov>], Paul
Brunner@MCCLELLAN@AFBDA.DCM

Hi Rick.

As part of our 'due diligence' for the Category 1 FOST, we need to review the potential risks associated with nearby contamination. I have identified several IRP sites in the vicinity of the Category 1 FOST parcels. These are:

PRL P-010
PRL S-033
Magpie Creek
AOC G-1
AOC G-2
PRL P-007
PRL S-40
AOC H-1
AOC H-13
PRL S-047
AOC H-12

We need a very brief summary for each site. This would include the following:

Reason the site was identified as an IRP site (background)
Sources of contamination
COCs
nature and extent of contamination
The HHRA for the site.

I could do this, but it would take time and I wouldn't be able to work on other priority activities. If it's too difficult for McAFB, perhaps you could at least steer me to the specific documents that discuss these sites.

Lastly, we need similar information on the source of the red soil gas and ground water 'blob' in the Buildings 4, 10, 7 area. We need this info to assess the risk of the FOST parcels.

Thank you.

Kevin Depies
CA Dept. of Toxic Substances Control
Ph: 916-255-3688
Fax: 916-255-3734

Memorandum

Date: November 15, 2002

To: Mr. Kevin Depies
Office of Military Facilities
Department of Toxic Substances Control (DTSC), Region 1
8800 Cal Center Drive
Sacramento, California 95826-3200

From: Environmental Management Branch
P.O. Box 942732
601 North 7th Street, MS 396
Sacramento, California 94234-7320
(916) 445-0498

Subject: DHS Review of the Draft Final Finding of suitability to Transfer (FOST) for Parcel A1, A2, A3, A7, L1 and Partial L3, McClellan AFB, CA

In March of 2001, the Department of Health Services requested that the site conceptual model for radioactive materials usage, storage and disposal be reevaluated because licensed radioactive material was discovered at Confirmed Site 10. McClellan AFB had previously stated that there was no evidence of disposal of licensed radioactive material in McClellan AFB landfills in such documents as the Radiation Summary Report and Data Gap Field Sampling Plan documents. Plutonium, americium and other Technical Operations Division (TOD) authorized radioactive materials had not been evaluated as a potential contaminant of concern for some buildings, waste lines, and landfills that could have been affected by TOD operations. Additionally, new information about the history of radioactive material use locations and potential burial sites has been found through record searches and former employee interviews conducted over the last year and a half.

In that same memorandum of 2001, DHS requested that all previous documents prepared under these assumptions be reevaluated considering the new conceptual model for radiation. It is our understanding that Site Specific Supplemental Environmental Baseline Surveys (SSSEBS) were finalized prior to these requests. Therefore, DHS requests that the Air Force confirm that the original information provided in the SSSEBS documents is still accurate even though new historical information has been compiled and address the historical site assessment issues covered in the November 14, 2002 DHS memorandum.

Mr. Kevin Depies
November 15, 2002
Page 2

This review was performed by Ms. Penny Leinwander, Associate Health Physicist, in support of the Interagency Agreement between DTSC and DHS. If you have any questions concerning this review, or if you need additional information, please contact Ms. Leinwander at (916) 324-1465.

Darice G. Bailey, Chief
Waste Management Section

cc: Ms. Penny Leinwander
PO Box 942732
601 N. 7th Street MS 396
Sacramento, CA 94234

Mr. Thomas B. Kempster
AFRPA/DD-McClellan
3411 Olson Street
McClellan, CA 95652

Mr. Glenn Kistner
US EPA, Region IX
75 Hawthorne Street (SFD-8-1)
San Francisco, CA 94105

Mr. Kevin Depies
November 15, 2002
Page 3

bcc: Edgar D. Bailey, Chief
Radiological Health Branch
601 North 7th Street, MS 396
Sacramento, CA 95814



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Edwin F. Lowry, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Gray Davis
Governor

December 20, 2002

Mr. Paul Brunner
AFRPA/DD-McClellan
3411 Olson Street
Room 105
McClellan, California 95652

DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER PROPERTY, PARCELS A1, A2, A3, A7, L1 and PARTIAL L3 (FOST)

Dear Mr. Brunner:

On October 9, 2002, we received the Air Force's supplemental information on clean-up sites adjacent to the transfer property detailed in the FOST. The Department of Toxic Substances Control (DTSC) requested the information in order to achieve a better understanding of the potential environmental impacts adjacent clean-up parcels may have on the area intended for transfer. Based on our completed review of this data, we find the adjacent parcels do not pose an environmental or human health risk to the parcels to be transferred.

We also received your letter dated November 12, 2002, in response to the October 1, 2002 memorandum from Mr. Robert Crandall, which addressed the necessary actions the Air Force must take in order to meet Resource Conservation and Recovery Act (Federal), 42 USC section 6901, 40 CFR (RCRA) requirements prior to property transfer. DTSC is providing additional guidance on regulatory requirements for the current proposed property transfers at McClellan Air Force Base (McAFB). DTSC understands the Air Force's desire to transfer property from federal government ownership to non-federal public or private ownership. DTSC will work cooperatively with Air Force staff to ensure all regulatory requirements for property transfer are met.

Because the U.S. Air Force operated a hazardous waste treatment and storage facility at McAFB in California, RCRA authorized state, corrective action requirements apply to "the entire site that is under control of the owner or operator." In order to transfer property to a new owner free of RCRA corrective action liability, the State must make formal determination that corrective action requirements are complete for the parcel proposed for transfer. Two specific actions must be completed prior to property

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

Mr. Paul Brunner
December 20, 2002
Page 2

transfer. First, DTSC must make a determination that Corrective Action requirements have been completed for any transferring parcel. This determination relieves the new owner of liability for existing conditions. Second, DTSC must formally modify the official boundary of McClellan Air Force Base for corrective action requirements.

The California Health and Safety Code, section 25200.5(k)(2), provides an exemption for inactive (non-permitted) facilities providing intent to close from the formal modification requirements of Article 4 of Chapter 20 of Division 4.5 of Title 22 California Code of Regulations (CCR). Additionally, the U.S. EPA published draft guidance in the Federal Register on February 27, 2002, which provides guidance for documenting the "Completion of Corrective Action Activities at RCRA Facilities." The draft guidance was written specifically to promote property transfer at RCRA facilities, with or without a permit.

Since McAFB's Hazardous Waste Facility Permit expired on June 4, 2000, and the Air Force has notified DTSC of its intent to close, DTSC is initiating an Article 4 equivalent procedure to make the corrective action complete determination and modify the facility boundary. I am outlining below the specific procedures for conducting this procedure.

In order to conduct an Article 4 equivalent determination:

1. McAFB must submit to DTSC a description of the exact change to be made to the facility, in this case the proposed transfer of property. In addition, McAFB must submit two maps. The first map should depict the current facility boundaries and the parcel(s) proposed for transfer. The second map should depict the revised facility boundary.
2. DTSC will prepare a Fact Sheet using the information provided in the FOST(s).
3. DTSC will publish a display ad public notice in the local newspaper.
4. DTSC will mail the Fact Sheet and public notice to the McAFB mailing list.
5. The public notice will provide 45 days for public comment on the proposed completion of corrective action and change in property boundary.
6. DTSC will review all comments received from the public and provide responses.
7. Finally, DTSC will publish a notice of our final determination.

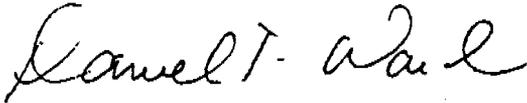
In conclusion, pending the RCRA actions required above, DTSC concludes these parcels require no remedial action and are suitable for transfer for unrestricted use. However, if any additional information concerning the environmental condition of said property becomes available in the future, the State reserves the right to address any appropriate environmental or human health related issues.

Mr. Paul Brunner
December 20, 2002
Page 3

Additionally, should the subject property be considered for the proposed acquisition and/or construction of school properties utilizing state funding at any time in the future, a separate environmental review process in compliance with the California Education Code Section 17210 et seq will need to be conducted and approved by DTSC.

If you have any questions or comments regarding this letter, or would like to arrange a meeting with DTSC management, please contact Mr. Alain Dehaze, Permit Project Manager, at (916) 255-3742 or Ms. Francesca D'Onofrio, Reuse Specialist, at (916) 255-3603.

Sincerely,



Daniel T. Ward, P.E.
Chief
Base Closure Unit
Office of Military Facilities

cc: Mr. Joe Healy
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. James Taylor
Regional Water Quality Control Board
3443 Routier Road, Suite A
Sacramento, California 95827

Mr. Robert Crandall
Land Disposal Branch
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826-3200

Mr. Paul Brunner
December 20, 2002
Page 4

cc: Mr. Alain Dehaze
Land Disposal Branch
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826-3200

Ms. Francesca D'Onofrio
Office of Military Facilities
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826-3200



California Regional Water Quality Control Board

Central Valley Region

Robert Schneider, Chair



Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

Sacramento Main Office
Internet Address: <http://www.swrcb.ca.gov/rwqcb5>
3443 Routier Road, Suite A, Sacramento, California 95827-3003
Phone (916) 255-3000 • FAX (916) 255-3015

15 July 2002

Attention: Mr. Paul G. Brunner
AFBCA/DD
3411 Olson Street
McClellan AFB, CA 95652-1071

DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL A1, A2, A3, A7, L1, AND L3 (DSR# 771-3), FORMER McCLELLAN AIR FORCE BASE (AFB), SACRAMENTO COUNTY

Thank you for the opportunity to review the subject document (FOST), submitted 12 June 2002. The purpose of the FOST is to document specific environmental conditions and findings and the suitability to transfer for the proposed deed of real property and any improvements at the former McClellan AFB, to the County of Sacramento under the terms of the conveyance agreement, to be operated by McClellan Park. Parcel L1 and part of L3 are being conveyed under a Public Benefit Conveyance. We have reviewed the FOST and the Responses to Comments and have determined that our comments on the draft (letter dated 25 April 2002) have been adequately addressed.

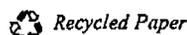
If you have any questions, please contact me at (916) 255-3069, or e-mail me at taylorjd@rb5s.swrcb.ca.gov.

JAMES D. TAYLOR, R.G.
Associate Engineering Geologist

cc: Mr. Joe Healy, United States Environmental Protection Agency, San Francisco
Mr. Kevin Depies, Department of Toxic Substances Control, Sacramento
Mr. Sigmund Csicsery, AFBCA/DD, McClellan AFB
Mr. Rick Solander, AFBCA/DD, McClellan AFB
Mr. Brian Hovander, AFBCA/DD, McClellan AFB

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California Environmental Protection Agency

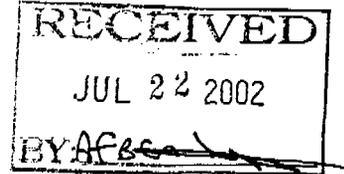


RECEIVED
JUL 16 2002



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

July 16, 2002



AFBCA/DM
Attn: Tom Kempster
3411 Olson St.
McClellan, CA 95652-1071

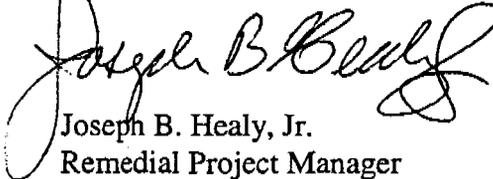
Re: EPA Review Comments (DSR Record #771-4) on the draft final FOST: Parcels A1, A2, A3, A7, L1 & L3

Dear Tom:

EPA is satisfied with the response to our comments on the draft version of the subject FOST. We have no additional comments on the draft final version and look forward to receiving the final version in the near future.

If you have any questions, please do not hesitate to call me at (415) 972-3269.

Sincerely,


Joseph B. Healy, Jr.
Remedial Project Manager

JBH/jbh

cc: James Taylor, RWQCB Kevin Depies, DTSC
Paul Brunner, McAFB

I am providing EPA's comments (below) for your convenience and to meet the DSR deadline. I am also sending these comments by U.S. Mail to the addressee and cc list stated in the letter. **Please check that the Air Force contractor receives an electronic copy.**

April 24, 2002

AFBCA/DM
Attn: Tom Kempster
3411 Olson St.
McClellan, CA 95652-1071

Re: EPA Review Comments (DSR Record #771-2) on the draft FOST: Parcels A1, A2, A3, A7, L1 & L3

Dear Tom:

Attached are comments from EPA's base closure specialist (John Hamill) and attorney (Steve Anderson) on the draft FOST: Parcels A1, A2, A3, A7, L1 & L3. I have reviewed these comments and am forwarding them to you as EPA's official comments on the above document.

If you have any questions, please do not hesitate to call me at (415) 972-3269.

Sincerely,

Joseph B. Healy, Jr.
Remedial Project Manager

JBH/jbh

Attachment:

1. John Hamill's comments on subject document
2. Steve Anderson's comments on subject document

cc: James Taylor, RWQCB Rick Solander, McAFB
Kevin Depies, DTSC Paul Brunner, McAFB

John Hamill's Comments
on the
draft FOST: Parcels A1, A2, A3, A7, L1 & L3

Section 4 Environmental Condition of the Property (1) Has the Air Force obtained EPA's certification that this property meets the criteria for Environmental Condition Category 1? If so, the FOST should cite the EPA concurrence.

(2) If lead-based paint [LBP] has been released to the environment, the property cannot be classified as ECC 1, since EPA considers LBP to be a CERCLA-regulated hazardous waste. The property could be classified as ECC 3, if the LBP is below action levels.

Section 5.4 Lead-Based Paint (LBP) - Facilities other than Housing
and Section 5.5 Lead-Based Paint (LBP) - Target Housing These sections must be revised to reference and be in compliance with (1) the DOD/EPA Lead Based Paint Guidelines for disposal of DOD Residential Real Property - A Field Guide, and (2) the TSCA 403 Rule which became effective 6 March 2001.

Section 7 If the property is ECC 3, this section must be revised to reflect the CERCLA Section 120(h)3 covenants, not the 120(h)4 covenant.

Steve Anderson's Comments
on the
draft FOST: Parcels A1, A2, A3, A7, L1 & L3

Section 5.1 Hazardous Substances Notification The first sentence should be reworded to make it clear that there are different notification requirements in 40 CFR 373.1 applicable to the release of hazardous substances than to the storage of hazardous substances. A hazardous substance notification is required when hazardous substances are known to have been released in quantities greater than or equal to the substance's CERCLA reportable quantity found at 40 CFR 302.4. The standard stated in Paragraph 5.1, "quantities exceeding 1,000 kilograms or the hazardous substances reportable quantity found at 40 CFR 302.4 (whichever is greater)," applies only to the storage of hazardous substances.

Section 5.2 Installation Restoration Program . . . The first sentence should be reworded to more closely follow the wording of CERCLA Section 120(h)(4)(D),¹ which provides for:

a covenant warranting that any response action or corrective action found to be necessary after the date of such sale or transfer shall be conducted by the United States

Section 5.4 Lead-Based Paint (LBP) - Facilities other than Housing It is unclear whether a restriction will be imposed on residential use of the property.

¹But see John Hamill's comment on Section 7. If the CERCLA Section 120(h)(3) covenant is used, it is recommended that the statutory language be quoted as exactly as possible, rather than paraphrased.



California Regional Water Quality Control Board

Central Valley Region



Winston H. Hickox
Secretary for
Environmental
Protection

Robert Schneider, Chair

Gray Davis
Governor

Sacramento Main Office

Internet Address: <http://www.swrcb.ca.gov/rwqcb5>
3443 Routhier Road, Suite A, Sacramento, California 95827-3003
Phone (916) 255-3000 • FAX (916) 255-3015

Attention: Mr. Paul G. Brunner
AFBCA/DD
3411 Olson Street
McClellan AFB, CA 95652-1071

25 April 2002

DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCEL A1, A2, A3, A7, L1, AND L3 (DSR# 771-1), FORMER McCLELLAN AIR FORCE BASE (AFB), SACRAMENTO COUNTY

Thank you for the opportunity to review the subject document (FOST), submitted 12 March 2002. The purpose of the FOST is to document specific environmental conditions and findings and the suitability to transfer for the proposed deed of real property and any improvements at the former McClellan AFB, to the County of Sacramento under the terms of the conveyance agreement, to be operated by McClellan Park. Parcel L1 and part of L3 are being conveyed under a Public Benefit Conveyance. We have reviewed the FOST and our Specific Comments are presented below.

SPECIFIC COMMENTS

1. Section 5.2, page 3, second paragraph, last sentence: This sentence mentions that a Sacramento County ordinance codifies a prohibition against drilling drinking water supply wells on and in the vicinity of McClellan AFB. The citation for the McClellan Prohibition Zone ordinance is as follows: *Sacramento County Code, Title 6, Chapter 6.29*. Please include this ordinance citation in this section.

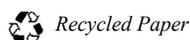
If you have any questions, please contact me at (916) 255-3069, or e-mail me at taylorjd@rb5s.swrcb.ca.gov.

JAMES D. TAYLOR, R.G.
Associate Engineering Geologist

cc: Mr. Joe Healy, United States Environmental Protection Agency, San Francisco
Mr. Kevin Depies, Department of Toxic Substances Control, Sacramento
Mr. Sigmund Csicsery, AFBCA/DD, McClellan AFB
Mr. Rick Solander, AFBCA/DD, McClellan AFB
Mr. Brian Hovander, AFBCA/DD, McClellan AFB

JDT/jt c:\mcclellan\Dr FOST A1-3 A7 L1 L3.doc

California Environmental Protection Agency



DRAFT

April 26, 2002

Mr. Tony Wong
Department of the Air Force
3411 Olson Street, Room 105
McClellan, California 94652

DRAFT FINDING OF SUITABILITY TO TRANSFER FOR PARCEL A1, A2, A3, A7, L1 and PARTIAL L3, McCLELLAN AIR FORCE BASE, CALIFORNIA

Dear Mr. Wong:

We have reviewed the above-referenced document in support of property transfer. In addition, a visual site inspection was conducted by DTSC during the week of March 25, 2002. Based on these actions, we have the following comments to provide:

1.a) Section 5.2, Installation Restoration Program (IRP) and Areas of Concern (AOC). As stated in this section, groundwater underlying the property proposed for transfer is not contaminated. However, it is known that groundwater contamination does exist on adjacent parcels. Therefore, please provide a descriptive summary in support of the conclusion that adjacent groundwater contamination does not pose a health risk to future users of the property to be transferred. Also include an analysis of sampling conducted to date that would support this conclusion. Until such time, DTSC withholds supporting a finding of suitability to transfer.

1.b) Section 5.2. The document doesn't address the VOC groundwater data gaps in the vicinity of Parcel A3. The GWOU Phase 3 Data Gaps FSP shows that there is uncertainty on the extent of VOC contamination in two plumes in this area. Based on a review of the figures in the FOST and the FSP, it is difficult to determine if the data gap in this area is in, or very close, to Parcel A3.

2. Section 5.5, Lead-Based Paint (LBP) - Target Housing. Based on sampling activities previously conducted by the Air Force, it is DTSC's understanding that lead in soil does not pose a health risk in the areas to be transferred. However, the FOST does not include any discussion in support of this conclusion. Therefore, as discussed in a phone conference with AF staff during the week of April 8, 2002, please expand this section detailing all lead in soil sampling activities, and sampling analysis, that have been conducted to date.

3. Section 5.6, Polychlorinated Biphenyls (PCBs). Please insert "fluorescent" before "light ballasts...".

4. Section 5.10, Sanitary Sewer Systems (Wastewater). This section states the sanitary sewer system downstream from the footprint of the FOST may be contaminated with radionuclides. Therefore, the AF proposes delaying transfer of the sewer system until investigation of the downstream portions are conducted. It is not clear if this approach will be applied to just specific segments of the sanitary sewer system or all sewer lines within the area

proposed for transfer. Also, please explain if a buffer zone has been placed on and around the sanitary sewer system. If so, has the buffer zone been approved by all members of the BCT? The issue of potentially radionuclide impacted sewer lines has been discussed by the BCT for early transfers, but has not been addressed in support of this FOST. Therefore, until this issue is addressed and resolved by the BCT, DTSC withholds supporting a finding of suitability to transfer.

If you have any questions regarding this letter, please contact me at (916) 255-3603 or Kevin Depies at (916) 255-3688.

Sincerely,

Francesca D'Onofrio
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