



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

June 17, 1993

F. Andrew Piszkin
Remedial Project Manager
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
Environmental Division
1220 Pacific Highway, RM 18
San Diego, California 92132-5181

Re: Marine Corps Air Station El Toro Superfund Site
Focused Feasibility Study for Operable Unit 1

Dear Mr. Piszkin:

I am writing in response to your June 4, 1993 request for concurrence from the Region IX Office of Regional Counsel on the focused approach to the feasibility study for Operable Unit 1, which will evaluate response actions for groundwater contamination at the Marine Corps Air Station El Toro Superfund Site. This response is based on the description of the focused approach set forth in the May 4, 1993 memorandum from you to CH2M HILL/CVO.

The May 4, 1993 memorandum acknowledges that the Marine Corps is obligated to comply with the Federal Facility Agreement ("FFA"), the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), the National Oil and Hazardous Substance Pollution Contingency Plan ("NCP"), and EPA guidance for performing a Feasibility Study ("FS") to determine appropriate remediation of groundwater contamination. The memorandum states that the approach of the focused FS will be to evaluate a limited number of alternatives for groundwater remediation, which will each include extraction, treatment, conveyance, and discharge/use of treated effluent. In preparing these alternatives, the Department of the Navy's contractor will rely in part of previous work performed by the Orange County Water District ("OCWD") in preparing for its Irvine Desalter Project.

EPA has no objection to a focused FS for the groundwater OU which evaluates a limited number of groundwater extraction, treatment, conveyance and discharge/use options. Nor does EPA

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object to the use of work performed by the OCWD, as long as that work meets the standards required under the FFA, CERCLA, the NCP and relevant guidance. However, as required by the NCP and EPA guidance, the FS must include evaluation of a no-action option. In addition, the options selected for evaluation in the focused FS must be based on consideration of remedial action objectives which include remediation of the aquifer as well as of the extracted groundwater.

If you have any questions, you may contact me at (415) 744-1382.

Sincerely,



Karen Goldberg

Assistant Regional Counsel