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MCAS EL TORO
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

6 April 1992

Andy Piszkin
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division
Code 1811
1220 Pacific Highway
San Diego, California 92132

Subject: EPA Review of Response to EPA
Comments on the Draft PR/VSI Report
for El Toro MCAS

Dear Mr. Piszkin:

This letter transmits our comments and review of the Response to EPA comments on the Draft PR/VSI Report.

While we are approving this document, we still have some comments to offer. No response is needed to our comments, they are submitted to you for your information. We believe this is a good working document that will be modified as the RI/FS investigation proceeds. If you have any questions regarding the attached comments or if you wish to discuss other matters related to the RI/FS, please contact me at (415) 744-2391.

Sincerely,

A handwritten signature in black ink that reads "John Hamill".

John Hamill
Remedial Project Manager
Federal Facility Enforcement
Branch

Attachment

cc: Lt. Commander Serafini, USMCAS El Toro
Manny Alonzo, DHS
Ken Williams, RWQCB

Technical Review of Response to EPA Comments on
Draft PR/VSI Report
MCAS - El Toro

GENERAL COMMENTS

There is a gap between "Sampling Visit" and "No Further Action." EPA agrees with the rationale for a sampling visit if there is evidence of spills or leaks and the area is located on unpaved soil or pavement with cracks. The RFA Guidance states that "No Further Action" (NFA) will be recommended if the SWMUs clearly have not released hazardous wastes or constituents into the environment. These two statements do not address what the proper actions should be if the SWMU cannot be physically identified or the information provided was insufficient for judging whether releases of hazardous wastes or constituents had occurred in the past. EPA cannot agree to place a SWMU of unknown condition in the NFA list. EPA, however, can agree to place a SWMU of unknown status or with insufficient information into a low priority action list. If the budget is available, more effort will be required to confirm the historical operation of a SWMU whose status is unclear.

1. Comment was adequately addressed.
2. No response required.
3. No response required.
4. No response required.
5. Comment was adequately addressed.
6. Comment was adequately addressed. The 24-hour rainfall is significant to the surface water, because the surface water is one of the major factors for evaluating the migration pathway and exposure potential.
7. Comment was adequately addressed.
8. Comment was adequately addressed.
9. Comment was adequately addressed.
10. Comment was adequately addressed.

11. No response required.
12. Comment was adequately addressed.
13. Comment was adequately addressed.

SPECIFIC COMMENTS

25. Comment was partially addressed. It is true that the past waste sources and waste practice information of the SWMUs were very difficult to assess. The efforts of document searches and information interpretation depend on the budget. The current aerial photography interpretation of MCAS-El Toro was completed by the EPA Environmental Monitoring System laboratory. This aerial photography site analysis report may be used to identify the start-up date of the Drum Storage Area. If budgeting is available, extra document searches may be conducted to confirm and identify the historical waste storage. EPA suggests that inadequate information for a SWMU makes it a "low priority action" item instead of a "no further action" item, because no further action is granted on a SWMU where confirmation exists that no release has occurred in the past.

The migration pathway and exposure potential are two key factors for evaluation of the SWMUs. The contaminated source, pathway, receptors, exposures and health impact are the factors for risk assessment. If these factors are not present, no remedial action will be required. Each pathway should be evaluated. NAVY believes that the level of detail in the write-ups is sufficient for the decisions/recommendations made in this report. However, from the EPA's point of view, it may not be enough for EPA to make the judgment that the recommendation is adequate. Although soil samples will be taken during the sampling visit, that does not indicate that no groundwater or surface water migration pathways exist. EPA suggests that potential migration/release pathways of all media (air, soil groundwater, surface water, and subsurface gas) should be discussed.

34. Comment was partially addressed. The Department of Toxic Substances Control (DTSC, formerly DHS) photographs taken in 1980 had identified SWMU No. 43. Due to lack of documentation, the actual location was not identifiable during the VSI. The NAVY suggests that no further action is necessary in that the SWMU clearly has not released hazardous waste or constituents into the environment. EPA disagrees with this recommendation. EPA suggests that the NAVY contact DTSC to ascertain who conducted the inspection and to interview the person who took the picture of that SWMU in order to identify the location. EPA can only agree to deem SWMU No. 43 a low priority action item instead of a no further action item. Further document searches and additional personnel interview to identify the SWMU may be necessary.
35. Comment was adequately addressed. EPA agrees with the NAVY's proposal to conduct additional interviews of station personnel about this area to obtain additional data for further evaluation.

36. Comment was partially addressed. EPA agrees to have a conference call or meeting with the NAVY to discuss the issues where disagreements cannot be resolved readily via written communications.
37. Comment was adequately addressed.
38. Comment was adequately addressed.
40. Comment was adequately addressed.
45. Comment was adequately addressed.
46. No response required.
52. Comment was adequately addressed.
53. Comment was adequately addressed.
54. Comment was adequately addressed.
55. Comment was adequately addressed.
56. Comment was adequately addressed.
58. Comment was adequately addressed.
59. Comment was partially addressed. If the SWMU was operated on an unpaved surface in the past, EPA will not agree that no further action will be taken. EPA can only agree to deem the SWMU a low priority action item. Further document searches and additional personnel interviews to identify the location of the SWMU may be necessary. This is also addressed at the beginning of the General Comment section.
60. Comment was partially addressed. See Comment No. 59.
61. Comment was partially addressed. See Comment No. 59.
62. Comment was adequately addressed.
63. Comment was adequately addressed. See Comment No. 59.
66. Comment was partially addressed.
68. Comment was adequately addressed.
76. Comment was adequately addressed.
77. Comment was partially addressed. See Comment No. 59 and the paragraph at the beginning of the General Comment section.
89. Comment was adequately addressed.

90. Comment was adequately addressed.
91. Comment was adequately addressed.
92. Comment was adequately addressed.
93. Comment was adequately addressed.
105. Comment was adequately addressed.
108. Comment was adequately addressed.
111. Comment was adequately addressed. EPA agrees that this SWMU will need to be discussed in a meeting with the NAVY to determine an ultimate recommendation for the RFA.
112. Comment was adequately addressed.
115. Comment was partially addressed. See Comment No. 59 and the paragraph at the beginning of the General Comment section.
118. Comment was adequately addressed.
119. Comment was adequately addressed.
120. Comment was adequately addressed.
121. Comment was adequately addressed.
124. Comment was adequately addressed.