



MCAS EL TORO LOCAL REDEVELOPMENT AUTHORITY • *Robert L. Richardson*
MCAS EL TORO MASTER DEVELOPMENT PROGRAM • *Interim Executive Director*

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MCAS EL TORO
SSIC #5090.3

September 11, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station - El Toro
P.O. Box 51718
Irvine, CA 92619-1718

SUBJECT: Proposed Plan for Operable Units 1 and 2A - Proposed Final Soil
Cleanup and Joint Treatment Facility for Groundwater

Dear Mr. Gould:

In August 2000, the Department of Navy/United States Marine Corps (DON/USMC) issued the "Preliminary Draft Final Proposed Plan for Final Soil Cleanup and Joint Treatment Facility for Groundwater" (Draft Plan). The Draft Plan presents the DON/USMC's proposed Preferred Remedy for remediation of the groundwater contamination at Installation Restoration Programs (IRP) Sites 18 and 24.

The Draft Plan focuses on evaluating remedial alternatives for IRP Sites 18 and 24. IRP Site 18, the Regional Groundwater Plume, has impact the principal aquifer and extends for approximately 3 miles from the western boundary of the Site. Based on a Remedial Investigation (RI), Site 18 has been impacted by the volatile organic compound (VOC) trichloroethene (TCE). Site 24, the VOC source area, is located on the Site and is comprised of the shallow aquifer, which has been impacted by TCE. Impacts to both Sites 18 and 24 have been linked to past site operations.

The Preferred Remedy (Alternatives 8A and 10B' Combined), as defined in the Draft Plan, is comprised of a network of groundwater extraction wells in both the principal aquifer and the shallow aquifer. Impacted groundwater will be extracted from these wells and sent to the proposed Irvine Desalter Project (IDP) for treatment and reuse. Based on the Draft Plan, natural attenuation is proposed to be the back up remedy should the IDP be postponed or terminated.



The Preferred Remedy, as defined in the Draft Plan, is directed towards the remediation of Sites 18 and 24 and does not incorporate any provisions for other impacts to the groundwater (CERCLA and non-CERCLA). The Draft Plan does not present a potential schedule for implementation of the Proposed Remedy.

Based on our consultant's, GeoSyntec Consultants, review of the subject document we offer the following issues/concerns for your consideration.

Issue/Concern No. 1

In the Draft Plan, the DON/USMC uses various terminology such as "water quality standards," "clean-up goals," "maximum contaminant levels," and "criteria and standards for VOCs" to describe the concentration of chemicals in groundwater or concentration of chemicals in treated water delivered for domestic use. This varied terminology is confusing to the reader. To clarify this issue, the DON/USMC should consider defining clearly the following:

- acceptable concentration of chemicals in groundwater (i.e., the concentration of chemicals in groundwater at which no remedy is needed or at which operation of the remediation systems would be terminated); and
- acceptable concentration of chemicals in treated water used for (i) domestic use and (ii) recycled water use.

These acceptable concentrations should be explicitly defined numerically for each chemical of concern in the groundwater. The risk to human health and safety during and upon completion of remedial activities should be discussed and stated in the Draft Plan. Consistent terminology should be used in the Draft Plan to eliminate potential confusion between remediation and treatment goals.

Issue/Concern No. 2

The remedy proposed by the DON/USMC includes constructing additional extraction wells and monitoring wells and installing a conveyance pipeline both off-base and on-base. In addition, it includes operating and decommissioning the system. Has the DON/USMC evaluated the impact of constructing, operating, and decommissioning the remediation and monitoring equipment on land reuse at MCAS El Toro? Has the DON/USMC developed a list of institutional controls for the selected remedy?

Issue/Concern No. 3

The DON/USMC has not completed the cost estimation and evaluation provided on page 17 of the Draft Plan, which makes the assessment of the various alternatives difficult.

The description of the Marine Corps Preferred Remedy (see Draft Plan at p. 16) also is unclear as to which elements of each alternative 8A and 10B' were kept in the Preferred Remedy. For example, Alternative 8A includes reinjection when described in page 12 of the Draft Plan; however, reinjection is not mentioned on page 16 of the Draft Plan. Similarly, is use of the existing irrigation wells part of the remedy? It would be helpful to present a more detailed description of the remedy, including a description of the CERCLA and non-CERCLA elements of the remedy.

Issue/Concern No. 4

The Preferred Remedy relies on the Irvine Desalter Project (IDP) (see Draft Plan at page 16) for treatment of groundwater. In addition, the DON/USMC indicates that while the IDP is not in operation, or if the IDP is terminated for any reason, the DON/USMC will rely on natural attenuation as a back-up remedy (see Draft Plan at page 16). However, the DON/USMC also states that monitored natural attenuation will be further evaluated

as part of the Record of Decision (ROD). Thus, it appears that the DON/USMC has not yet established that natural attenuation is an affective remedy for Sites 18 and 24. Given this, the DON/USMC should verify, rather than simply assume, that natural attenuation is an effective back-up remedy.

Issue/Concern No. 5

The Draft Plan is focused on groundwater remediation objectives that pertain to the CERCLA investigations and potential remedial actions for Operable Unit 1 Site 18 and Operable Unit 2A site 24. The Draft Plan does not consider groundwater remediation associated with the various compliance programs (i.e. the operation, monitoring, closure, and removal of underground storage tanks, aboveground storage tanks, and fuel supply pipelines; and hazardous materials/waste management and solid management) mandated under the Resource Conservation and Recovery Act. We recommend the DON/USMC revise the Draft Plan to address the following concerns:

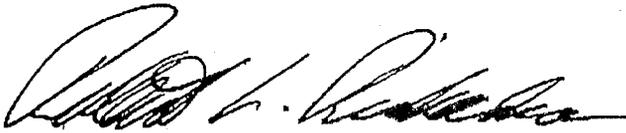
- How does the DON/USMC's Preferred Remedy (Alternatives 8A and 10B' Combined) address existing groundwater impacts from other potential sources (i.e. leaking underground storage tanks (LUSTs), and fuel supply lines)?
- What are the potential additional risks to human health and the environment from these other potential sources?

We recommend that DON/USMC address these issues/concerns before the proposed Draft Plan is finalized. Answers to these issues/concerns will assist us in further determining the strategies for redevelopment of these sites,

Also, please note that since the Draft Plan is preliminary and only includes conceptual information about previous investigatory work performed by DON/USMC (remedial Investigation, Feasibility Study, and modeling) at these Sites, the review by our consultant is preliminary and fairly conceptual in nature. We may provide additional comments upon review of additional documents and Draft Final Proposed Plan.

We appreciate the opportunity to review the Draft Plan and look forward to working with you on this and other cleanup related issues at MCAS El Toro.

Sincerely,



Robert L. Richardson
Interim Executive Director
MCAS Local Redevelopment Authority

cc: Triss Chesney, DTSC
John Broderick, CRWQCB
Glenn Kistner, USEPA
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Opportunity Ahead

MCAS EL TORO MASTER DEVELOPMENT PROGRAM

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Thanks!

Polin