

February 2001

Response to Review Comments

Document Title:

- (1) Draft Amendment to Draft Work Plan, Phase II Remedial Investigation, IRP Site 1-Explosive Ordnance Disposal Range, Marine Corps Air Station, El Toro, California, October 2000.

Reviewer: Glenn Kistner, RPM, Federal Facilities Cleanup Branch, U.S. EPA, Region IX SFD-8-2 letter dated November 9, 2000.

Comment No.	Section/ Page No.	Comment	Response
GENERAL COMMENTS			
1.		<p>The United States Environmental Protection Agency (EPA) has reviewed the above referenced document. While EPA finds that overall the Work Plan Amendment (WPA) is satisfactory for the proposed work, our comments concerning the investigation and removal of unexploded ordnance (UXO) must be addressed since both Work Plans do not describe the final disposition for any UXO that may be found at Site 1.</p> <p>Therefore, prior to conducting the proposed field activities described in the WPA, a process for remediating/removing any UXO hazards should be incorporated into the document.</p>	<p>The Site 1 EOD Range is currently being evaluated using the Range Rule Risk Methodology (R3M). As part of this evaluation, an UXO Evaluation Work Plan is being developed. This plan will address the investigation and removal of potential UXO that may be present at Site 1 and will be conducted as a parallel investigative effort. The draft UXO Evaluation work plan will be issued in March 2001. If Ordnance/Explosive (OE) items are encountered during the field investigation activities they will be handled in accordance with an Appendix to the Health & Safety Plan. (The Appendix is being developed and will provide UXO avoidance support for sampling activities).</p> <p>The field activities discussed in the WPA pertain to the 5-acre area to the south of the Southern EOD Range. This area was not historically used for EOD training activities. However, if UXO or related items are encountered during the sampling of this 5-acre area, UXO avoidance in accordance with the Health and Safety Plan will be followed.</p>
2.		<p>In addition, the procedures (presumably contained in SOP 4, to Soil Sampling) to be used to collect the soil samples and decontaminate sampling equipment between sampling locations should be attached to the WPA. This will assist the field workers as they carry out their activities.</p>	<p>Typical practice is to attach the referenced SOPs to the Work Plan copy that will be provided to the field workers. The Phase II RI Work Plan summarizes all the SOPs that are referenced.</p>

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- (1) Draft Amendment to Draft Work Plan, Phase II Remedial Investigation, Installation Restoration Program (IRP) Site 1 Explosive Ordnance Disposal (EOD) Range, Marine Corps Air Station (MCAS), El Toro, California, September 2000.

Reviewer: Triss M. Chesney, P.E., Remedial Project Manager, Southern California Branch, Department of Toxic Substances Control, Letter dated December 15, 2000.

Comment No.	Section/ Page No.	Comment	Response
1.		DTSC submitted comments on December 15, 2000 to the <i>Draft Work Plan, Phase II Remedial Investigation, IRP Site 1, Explosive Ordnance Disposal Range, Marine Corps Air Station, El Toro, California</i> (Work Plan), prepared by Earth Tech, Inc., dated September 2000. Since this amendment must be used in conjunction with the Work Plan, please ensure that the appropriate revisions are also made to this draft Amendment and are consistent with DTSC's comments on the Work Plan.	All appropriate revisions to both documents will be made.
2.	Section 3.1.4	<p>Study Boundaries: The second sentence states "The sampling depths were selected based upon the scope of historic EOD training activities, associated disking of the soil, and the results of the geophysical survey.</p> <p>Sufficient information is not provided to indicate if the entire five-acre area was disked regularly. In areas that were not disked regularly, DTSC recommends that the sample proposed for collection at 1.5 feet bgs be collected closer to the surface at a depth of 0.5 to 1.0 feet bgs.</p>	<p>The whole Site 1 area was disked as part of fire prevention exercises. Accordingly, the samples will be collected 1.5 feet bgs.</p>
3.	Section 4.1	<p>Sampling Objectives for the Five-Acre Area at Site 1:</p> <p>In addition to trip blanks, temperature blanks, field duplicates, field blanks and equipment rinsate blanks as mentioned in this section, field split samples should be collected. Field splits are samples split in the field and then sent to two different laboratories to be analyzed for the sample analytes. Significant differences between results indicate error in overall measurement system.</p>	<p>Splitting soil samples in the field and comparing the results between different laboratories is generally not the most effective method for assessment of laboratory measurements systems. The approaches selected for this project are believed to be sufficient assurance of the quality of the measurement systems.</p>

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4.	Section 4.1	<p>Sampling Objectives for the Five-Acre Area at Site 1:</p> <p>“Two soil samples from each location will be analyzed for volatile organic compounds (VOCs), total extractable and total volatile petroleum hydrocarbons [TPH(e) and TPH(v), respectively], explosives, metals, pH, nitrate and perchlorate. Select samples will be analyzed for SVOCs [semi-volatile organic compounds], dioxins, and furans.” Table 4-1 indicates that SVOC analysis will be performed on nine samples, dioxins and furans on four samples.</p> <p>According to Section 3.1.7 – Sampling Design, “Two soil samples will be collected at each location at depths of approximately 1.5 feet and 5 feet bgs. Samples will be collected from 17 locations evenly distributed over the study grid.” As a result, a total of 34 random samples will be collected. Please provide a explanation for not analyzing all of the random samples for SVOCs, dioxins and furans. Additionally, please provide an rationale for selecting the limited samples to be analyzed for SVOCs, dioxins and furans.</p>	<p>The Work Plan will be modified to reflect that all samples will be analyzed for SVOCs. The preliminary SVOC results will be used to select the most contaminated 10% for analysis of dioxins/furans. As there is no significant source of dioxins and furans yet identified at this site, this is believed to be sufficient assurance that these compounds are not significant COPCs.</p>