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CLEAN II Program
Bechtel Job No. 22214
Contract No. N68711-92-D-4670
File Code: 0202/0321

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MCAS EL TORO
SSIC # 5090.3

IN REPLY REFERENCE: CTO-0059/000262

November 27, 1995

Commanding Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Paul Kennedy, Code 0233.PK
Building 128
1220 Pacific Highway
San Diego, CA 92132-5187

Subject: Response to Comments for Draft Final Work Plan and Field Sampling Plan, Phase II Remedial Investigation/Feasibility Study, MCAS El Toro California, CTO-059

Dear Mr. Kennedy:

Enclosed is one copy of the Response to Comments for Draft Final Work Plan and Field Sampling Plan, Phase II RI/FS, MCAS El Toro California, prepared for CTO-059 under Contract No. N68711-92-D-4670.

We have submitted the appropriate number of copies of this plan to individuals on the attached transmittal.

If you have any questions, please contact Timothy Latas at (619) 687-8848, or me at (619) 687-8802.

Very truly yours,

David K. Cowser
Project Manager

DKC/sp

Enclosure: Response to Comments for Draft Final Work Plan and Field Sampling Plan for CTO-059



Bechtel National, Inc. *Systems Engineers—Constructors*



BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-92-D-4670

Document Control No.: CTO-0059/000262

File Code: 0202/0321

TO: Commanding Officer
 Naval Facilities Engineering Command
 Southwest Division
 Mr. Paul Kennedy, Code 0233.PK (1 copy)
 Building 128
 1220 Pacific Highway
 San Diego, CA. 92132-5187

DATE: November 27, 1995
 CTO #: 0059
 LOCATION: San Diego, California

FROM: [Signature]
 D. K. Cowser, Project Manager

[Signature]
 J. W. Kluesener, Operations Manager

DESCRIPTION: Response to Comments for Draft Final Work Plan and Field Sampling Plan
Phase II Remedial Investigation/Feasibility Study
MCAS El Toro, California, CTO-0059

TYPE: Contract Deliverable CTO Deliverable Change Notice/Project Note
 Other

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 (PM to Identify)

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NUMBER OF COPIES SUBMITTED: Five (5)

COPIES TO (Include Name, Navy Mail Code, and No. of Copies):

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V. Parpiani, El Toro (6)
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L. Vitale, CRWQCB (1)

Date/Time Received

* Transmittal Only
 † If "Yes" copy C. Potter

RESPONSE TO COMMENTS
DRAFT FINAL WORK PLAN AND FIELD SAMPLING PLAN
PHASE II RI/FS
MCAS EL TORO, CALIFORNIA

<p>Originator: Bonnie Arthur, Remedial Project Manager US EPA</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: 19 September 1995</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p><u>MAJOR COMMENTS</u></p>	<p><u>RESPONSES TO MAJOR COMMENTS</u></p>
<p>1. As discussed at the 9/13/95 field meeting, EPA would like to have increased involvement with the air sparging and SVE pilot studies.</p>	<p>RESPONSE 1: An air sparging and soil vapor extraction pilot test work plan will be prepared and submitted to the BCT for review.</p>
<p>2. Page 4-2, 4-43: Replace RBCs with PRGs as used elsewhere in the revised work plan. Also, ensure proper usage PRGs.</p>	<p>RESPONSE 2: U.S. EPA Region IX PRGs are used in the Work Plan and will be used in the field for risk screening.</p>
<p>3. Page 4-5, Step 2, #10; EPA's comment regarding background levels refers to surface and sediment background levels, not soils.</p>	<p>RESPONSE 3: Background for surface water and sediment are discussed in Section 4.2.3.4 (page 4-22 through 4-25).</p>
<p>4. Page 4-9: The use of the soils background levels should be revisited by the BCT. According to regulatory agency personnel, the calculated soils background levels (calculated from 11 samples) were intended for limited use.</p>	<p>RESPONSE 4: Discussion of soil background for metals is continuing with the BCT.</p>
<p>5. Page 4-22; Please identify the table comparing PRGs and immunoassay detection limits as referenced on Page #4 of the Response to Comments. Table 4-4 gives detection limits not PRGs.</p>	<p>RESPONSE 5: No table in the Work Plan provides a direct comparison of Immunoassay detection limits to PRGs. Immunoassay kits will be ordered to provide detection to 60 µg/kg in order to achieve a 61 µg/kg PRG for benzo(a)pyrene, which is the lowest PRG for the polynuclear aromatic hydrocarbon COPCs.</p>
<p>6. Page 4-33: Only the carcinogenic risk range is provided as the criteria for unacceptable preliminary human health risk. Add Hazard Index for noncarcinogens. Additionally, state when ecological risks would be calculated.</p>	<p>RESPONSE 6: On page 4-43, the Work Plan includes both cumulative cancer risk and hazard index for noncarcinogens as action levels. Ecological risk calculations will occur following biota sampling and analyses (see Risk Assessment Plan, Section 5, August 1995)</p>
<p>7. Site 3: The objective statement for Site 3 was not modified as stated in the response to comments.</p>	<p>RESPONSE 7: The objective was to be modified to state new groundwater monitoring data and lysimeter data will be reviewed to evaluate whether Site 3 is the source of petroleum hydrocarbons in groundwater.</p>
<p>8. Site 3: Which table states that dioxin analyses will be conducted?</p>	<p>RESPONSE 8: Dioxin is not listed on a table, however, the samples collected at the lowest portion of the lysimeter boring will be submitted for this analysis.</p>

**RESPONSE TO COMMENTS
DRAFT FINAL WORK PLAN AND FIELD SAMPLING PLAN
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<p>Originator: Bonnie Arthur, Remedial Project Manager US EPA</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: 19 September 1995</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0059 File Code: 0306</p>
<p>9. Page H-15: Please correct typographical error. A “No Further Investigation” decision for Site 7, Unit 2, was not agreed to. This is stated correctly on Page H-33.</p>	<p>RESPONSE 9: NFI is proposed for site units when no screening risk levels are exceeded when a sufficient number of samples have been collected.</p>
<p>10. Pages O-i, Step 2 and W-39, Step 3: Change “No Further Response Action Planned (NFRAP)” to “No Further Investigation (NFI).” For example, see Site 12. EPA’s legal staff is evaluating the use of NFRAPs at MCAS El Toro.</p>	<p>RESPONSE 10: A “No Further Action” is a possible outcome for an entire site following the Phase II RI. A NFI may be a possible outcome for individual site units following the Phase II RI.</p>
<p>11. Page V-1: Please discuss why this site was changed from “Sewer Lines” to “Industrial Wastewater Sewer Lines.” Also, as discussed in the Response to Comments, Page #14, sediment sampling may be necessary in areas such as Sites 10 where discharges are known to have occurred.</p>	<p>RESPONSE 11: The change to “Industrial Wastewater” was to distinguish these sewer lines from sanitary sewer lines. Sediment samples results from Bee Canyon wash in the Phase I RI technical memorandum did not indicate runoff from Site 10 is a problem.</p>
<p>12. Please provide the schedule for the new EE/CAs.</p>	<p>RESPONSE 12: To be provided in weekly BCT briefings.</p>
<p>13. Site 24: EPA concurs with your decision to proceed with limited surface sampling in the unpaved areas of the flightline. Please discuss he proposed analyses with the BCT at one of our weekly field meetings/conference calls.</p>	<p>RESPONSE 13: Comment noted.</p>