



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

FEB 23 1996

February 16, 1996

Joseph Joyce
BRAC Environmental Coordinator
Environment and Safety (Code 1AU)
MCAS El Toro
P.O. Box 95001
Santa Ana, CA 92709-5001

Dear Mr. Joyce:

EPA has reviewed the "Draft Operable Unit 1 Interim Proposed Plan" for MCAS El Toro, received on December 18, 1995. Please address the enclosed comments (Enclosure A) in the revised report. If you have any questions, I can be reached at 415/744-2368.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie Arthur".

Bonnie Arthur
Remedial Project Manager
Federal Facilities Cleanup Office

Enclosure

cc: Mr. Tayseer Mahmoud, DTSC
Mr. Larry Vitale, RWQCB
Mr. Andy Piszkin, SW DIV
Mr. Dante Tedaldi, Bechtel

ENCLOSURE A

EPA COMMENTS ON THE "DRAFT OPERABLE UNIT 1 INTERIM PROPOSED PLAN"

Major

- 1) It is our understanding that the recommended contingency alternative proposed in the "Draft Operable Unit 1 Interim Proposed Plan" may change given the Navy's intent to evaluate additional alternatives for the principal aquifer based on EPA and Cal/EPA's 12/15/95 and 1/22/96 comments on the "draft Interim Action Feasibility Study."
- 2) Page 4, paragraph 3 and throughout the Proposed Plan; The OU-1 definitions should clarify which portions of the shallow and principal aquifers are included within the "area of concern."
- 3) Page 4, paragraphs 5 and 6; Please delete the following sentence as the conclusions are inappropriate: "However, sufficient data exist to select a cleanup remedy for the OU-1 VOC groundwater contamination, and the remedial action to be implemented is expected to be a final action for the area of concern." Additionally, please move the following sentence from paragraphs 6 to 5, and insert before the sentence starting with "A final site-wide ROD...": "Because OU-1 does not geographically include all groundwater contamination at MCAS El Toro, the ROD for OU-1 will be an interim ROD."
- 4) Page 5, Figure 3; Is the green boundary line accurate for the area of the "Regional Groundwater Contamination Investigation?" For example, are there monitoring wells extending to the intersection of Harvard and Trabuco and throughout the entire boundaries of MCAS El Toro? Additionally, the figure and text should clarify that portions of both the shallow and principal aquifers are included in the OU 1 definition.
- 5) Page 5, paragraph 2; The text states that Figure 3 shows the "area of concern." As discussed above this text should include that the "area of concern" includes both shallow and principal aquifer groundwater. It may be more clear to include a figure for both shallow and principal aquifers.
- 6) Page 6; Please present the risk calculations individually for the shallow and principal aquifers.
- 7) Pages 6, 7; Page 6 discusses the noncarcinogens and that 8 of 93 monitoring wells have a hazard index greater than 1 under the reasonable maximum exposure scenario. Is it stated in the Proposed Plan that these levels will be reduced by Alternative 6A--prior to this groundwater used as drinking water?
- 8) Page 7, 1st paragraph; Provide the reference to the document

which the regulators reviewed which concluded that "TCE levels are so low that both EPA and the state have concluded that any risk to human health or the environment is negligible."

9) Page 7, last paragraph; Please delete the underlined words and add the bolded words in the following sentences: "The groundwater at MCAS El Toro has some constituents other than VOCs, such as nitrates and salts, whose presence is unrelated to Station activities. These constituents that are present throughout the area at varying levels."

10) Page 8, 2nd paragraph; It may be more clear to state the following: "Each of these technologies was screened on the basis of its effectiveness, implementability and cost, consistent with the NCP and EPA's "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA."

11) Page 9, paragraph 3 and throughout document; The following sentence should be clarified: "There would be no Irvine Desalter Project in operation." Please revise text to state that the Irvine Desalter Project would not be part of the remedy and would never occur.

12) Page 9, paragraph 6 and throughout document; If the Navy selects an end-use which requires further treatment, other than for VOCs, the Navy is responsible to ensure this water is treated to meet appropriate standards. This does not preclude the Navy from establishing agreements to have this done. Therefore, it is more appropriate to revise the text as follows and in similar sections throughout the proposed plan. Delete the underlined words and add the bolded words in the following sentence: "The Irvine Company would be accountable for compliance with any All regulatory requirements related to the use or discharge of the irrigation water **will be met.**" Similarly paragraph 9 on page 9 should be revised as follows: Delete the words "by the water purveyor" from the first sentence. Delete the underlined words and add the bolded words in the following sentence: "The purveyor would be accountable (in an agreement with the U.S. Marine Corps/Navy) for compliance with all regulations related to treatment, use, or discharge of the water **would be met.**" The text can be further clarified by adding the following: "In any agreement between Marine Corps/Navy and the water purveyor, the Marine Corps/Navy will ensure all such requirements would be met." Similar changes should be made for the text on pages 10 and 11.

13) Page 10; Diagram incorrect. Reverse osmosis is first in treatment train. This figure is difficult to describe and can be deleted as the text covers this issue.

14) Page 11, paragraph 10; Under the heading "How do the cleanup Alternatives Compare?", it may be more clear to provide

the analysis of the alternatives first, and then follow-up with the conclusion and Navy's recommendation.

15) Pages 11 and 12, paragraph 10; The actual timeline which is provided on page 15 should be cited in the discussion of the contingency remedy. Objective criteria should be provided for the process of selecting the contingency remedy. For example, the contingency remedy could be triggered if the negotiations with Orange County are not successful by a certain date. This should be clearly stated in this document and not just included in the draft Record of Decision.

16) Page 13; The \$33.8 million estimate is just one estimate of the Navy's share in a joint Desalter system. Please include a footnote which states that the final figure would be dependent upon negotiations between the Navy and Orange County Water District.

Minor

1) Page 1 and throughout document; Delete computer file names from all figures.

2) Page 2, paragraph 7; Delete coma after the word "plating."

3) Page 2, paragraph 8; page 3, paragraph 6; page 5, paragraph 1; page 7, paragraph 9; page 10, box; page 11, paragraph 3; page 12, paragraph 2; page 12, box; page 14, paragraph 2; The words State and Federal should be lowercase.

4) Page 2, paragraph 9; Delete the underlined words in the following sentence: "The exact source of the VOCs in the regional groundwater near MCAS El Toro has not yet been pinpointed, but studies have shown that, over the years, hazardous chemicals spilled or released there have seeped down through the soil into the region's groundwater."

5) Page 2, paragraph 10; Delete the underlined word in the following sentence: "To use the groundwater in this area, they will need to extract (pump out) groundwater and clean it up to meet the quality standards for drinking water set by environmental agencies."

6) Page 2, Table 1; Spell out "ppb" and include a definition on page 16. Also, in the footnote, change "and" to "or."

7) Page 3, paragraph 10; Delete the comas after the words "fueling" and "solvents."

8) Page 3, paragraph 14; Delete the coma after the word "from."

- 9) Page 4, paragraph 7; Delete the underlined phrase from the following sentence: "In the Phase 1 Remedial Investigation, the U.S. Marine Corps/Navy installed 95 groundwater monitoring wells to tap into the groundwater at different locations and depths below ground surface. Delete the coma after the word "District."
- 10) Page 5, paragraph 1; Delete the comma after the word "metals."
- 11) Pages 6, 7, 9, 14; Spell out numbers nine and under.
- 12) Page 8, Irvine Desalter Project (IDP); The language is awkward in the following sentence: "The U.S. Marine Corps/Navy evaluated how much of the VOC contamination the wells for this project could be expected to clean up."
- 13) Page 10, 1st paragraph; Please clarify the following sentence by adding the words in bold and deleting the underlined phrase: "The shallow groundwater would not be pumped and treated separately in this alternative **at all**."
- 14) Page 12, paragraphs 2, 3; Delete underlined comas which are placed prior to the word "and" in the following sentences: a) "Alternatives 2A, 2B, 2D, 6A_u and 6B..." b) "Alternatives 2D, 6A_u and 6B" c) "Alternatives 2A, 2B, 2D_u and 6B" d) "Alternatives 2B, 2D, 6A_u and 6B."
- 15) Page 16, definition box; "Feasibility study" is spelled incorrectly.