



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

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CODE 10

FEB 10 2:41 PM

February 9, 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 Action Memorandum Non-Time-Critical Removal Action for Unit 2 of Site 19-Aircraft Expeditionary Refueling Site" for MCAS El Toro, received on January 8, 1996. 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", with a long horizontal flourish extending to the right.

Bonnie Arthur
Remedial Project Manager
Federal Facilities Cleanup Office

Enclosure

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

ENCLOSURE A
EPA COMMENTS ON THE SITE 19 DRAFT ACTION MEMORANDUM

1) Pages 1, 10; It is not clear whether offsite landfill disposal or treatment is recommended. One of the removal action objectives under the "Purpose Section" is to "install and operate an appropriate soil treatment system that will prevent unacceptable discharges or emissions." However, page 10 states that off-site landfill disposal is the selected alternative.

2) Page 3; EPA agrees that a 5 mg/kg cleanup level may be a reasonable removal action cleanup level for PCBs, given the location of this site. As previously discussed, the final risk assessment for this Operable Unit will evaluate the risk of any PCBs left in the soil after the removal. Additionally, as stated before, if the reuse plan designates this area with a use different than industrial, the Navy/Marine Corps will have to revisit this site to evaluate whether the removal action is protective. It is reasonable to cite 40 CFR 761 (c)(4)(v) as one basis for the 5 mg/kg cleanup level, however, this reference is most applicable to spill cleanups.

3) Page 3, 2nd and 3rd paragraphs, Table 1; Please revise text regarding comparison of PRGs with arsenic and beryllium concentrations. Arsenic levels at Site 19 are slightly above the PRGs, however, the data presented indicate that beryllium levels are below PRGs. Therefore, the discussion of PRGs and metals levels above background is only applicable to arsenic. The PRG is not modified after comparison to background. Regulatory agencies generally do not require cleanup of background contaminants, if the background level has been accepted. In this case, these background levels are currently being recalculated. For this reason, please change the heading for the "Background Concentration" column in Table 1 to "Preliminary Background Concentration." Based on preliminary recalculations, it appears that the arsenic background level will be approximately 4 mg/kg, which is higher than any levels found to date at Site 19.

4) Page 6, section 4, 3rd paragraph; Please correct the text regarding groundwater constituents as stated in the Draft Final EE/CA, 04 October 1995, Site 19, page 3-5, 2nd full paragraph.

5) Page 8, section 1, 1st paragraph; Please delete the underlined words and add the bold words in the following sentence: "The DON is the lead federal agency for the removal action and the U.S. EPA is the lead regulatory agency because MCAS El Toro is **on EPA's National Priority List. of the Superfund Program.**" MCAS El Toro is a NPL site but it is not funded by the Superfund Program. All CERCLA restoration funds are obtained through the DOD BRAC III accounts.

6) Page 8, section 1, 2nd paragraph; Delete "RIs" from examples. No RIs have been issued for Site 19.

7) Pages 11, 13; The following sentence is not correct: "The results of the confirmation sampling for analytes other than the identified COPCs are for documentation purposes only." It is correct that the BCT has agreed to base the extent of soil excavation on PCB levels. However, the confirmation sampling results will be screened against PRGs and ecological screening levels and if the site has any elevated contaminants left after the removal action, the site will be evaluated in the OU 3 FS.

Page 13 is not consistent with page 11. Page 13 states that "when on-site analyses and visual inspection indicate that PCB removal cleanup goals have been achieved, samples from the bottom and walls of the excavation will be taken to confirm that removal cleanup goals for the COPCs are achieved." However, as discussed above, cleanup goals have only been established for PCBs. The BCT can revisit this issue if the Navy requests. It may be advantageous to establish preliminary cleanup goals for other COPCs. Generally it is recommended to select conservative cleanup goals for removal actions to decrease the risk of revisiting the site for further cleanup after the RI/FS is finalized.

8) Page 11; It is not known at this time that Unit 2, Site 19 is "not a source of groundwater contamination." Please revise the text.

9) Pages 11 (section 2), 12 (section 3); Offsite landfill disposal is not considered treatment. Please revise the text.

10) Page 12, section 3, 1st paragraph; Please correct the typographical error. Table 2 does not include a summary of effectiveness, implementability, and cost. Additionally, Table 4 includes nine alternatives not three. Also, the no action alternative is missing.

11) Page 15, Alternative 1, last paragraph; The text identifies the contingency associated with the final cost for this alternative. However, subsequent discussions and tables do not identify the total costs. This also applies to Alternatives 2 and 4. Costs are only provided for Alternative 3 in Table 5, however, the text on page 16 neglects to identify Table 5.

12) Page 17, section 5, 7th paragraph; This paragraph can be deleted. This information is provided in the 4th paragraph of this page.