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Ms. Julie Anderson
U. S. Environmental Protection Agency (EPA)
Region IX
Code H-9-2
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Anderson:

The purpose of this letter is update you on the Department of the Navy (DON) planned approach for the Marine Corps Air Station (MCAS), El Toro, Draft Final Interim Action Feasibility Study (IAFS) for Operable Unit No. 1 (OU-1).

On December 15, 1995, DON received EPA's formal comments on the October 15, 1995, draft OU-1 IAFS. These comments raised significant questions concerning the objectives, proposed approach, and costs for remedial action for OU-1. DON requested clarification. Regulatory agency comments were clarified in a January 11, 1996, meeting at EPA's Region IX office among the MCAS, El Toro, Federal Facility Agreement (FFA) signatories, an EPA letter of January 22, 1996, and a technical meeting to resolve groundwater modeling issues held at EPA's office on February 6, 1996. Our approach is based on these recent communications.

We understand the following to be key regulatory agency issues regarding the OU-1 draft IAFS. DON intends to address each one of the issues.

1. The active remediation of the shallow groundwater unit (SGU) is the regulators No. 1 priority.
2. The regulators expressed concern over the cost/benefit associated with alternatives using a risk-based approach to principal aquifer remediation. The cost effectiveness of principal aquifer cleanup verses incremental risk reduction should be analyzed.
3. The agencies recommend DON develop an additional feasible alternative which focuses on active remediation of the SGU and passive or limited remediation and long-term monitoring of the principal aquifer.
4. Any additional alternative will require modeling to validate effectiveness.
5. The remedial action must still meet maximum contaminant levels (MCLs) for the volatile organic compounds (VOCs) in the principal aquifer whether the remediation is active or passive.
6. Shallow groundwater extraction system should be completed and operational prior to the initiation of Orange County Water District's Irvine Desalter Project (IDP) or any other principal aquifer groundwater treatment system.

7. Results of the phase II remedial investigation of the VOC source area should be incorporated into the draft final IAFS.
8. The impact to the FFA schedule should be minimized.

As stated in the draft Proposed Plan for the OU-1 Interim Remedial Action dated December 18, 1996, there are currently two distinct preferred feasible alternatives being considered by DON. The two alternatives are Alternative 2A, a DON stand alone project, and Alternative 6A, a joint project between DON and the Orange County Water District (OCWD).

Proposed Approach

As with the draft IAFS, the draft final IAFS for OU-1 will evaluate interim remedial alternatives due to the exclusion of non-VOC issues. Like the draft, the draft final IAFS for OU-1 will set the stage for final decisions on VOCs for the identified area of concern in the Interim Record of Decision (ROD) for OU-1. The remedial action objectives remain the same.

1. Reduce the concentrations of VOCs in the area of concern in the shallow groundwater and in the deep groundwater downgradient of the source areas to Federal or State cleanup levels.
2. Contain migration of VOCs above cleanup levels in the deep groundwater within the area of concern.
3. Prevent domestic use of groundwater containing VOCs above cleanup levels.

DON will focus the regulatory agency comments on Alternatives 2A and 6A only while still incorporating the appropriate adjustments in the rest of the document. DON will add at least two alternatives to address comments. These will consist of variations in Alternatives 2A and 6A, preserving the "decision tree" approach. In all of the comments received to date on the draft IAFS from the regulatory agencies, Restoration Advisory Board (RAB) members, and OCWD, there is no measurable support for any of the twelve alternatives other than Alternatives 2A or 6A. For these reasons, at least two additional alternatives will be fully evaluated in an Addendum that will be submitted as part of the draft final IAFS.

More specifically, at least two additional alternatives will be evaluated in the draft final IAFS and compared with the existing alternatives using the EPA's nine evaluation criteria. Part of our effort in developing new alternatives may include incorporating a biological degradation (natural attenuation) factor; assessing the level of additional pumping, if any, required to prevent further spread of the plume; examining institutional control options; and providing a risk based cost/benefit analysis. In order to incorporate key results of the phase II remedial investigation of the VOC source area, DON intends to adjust some of the groundwater modeling parameters and present the impact of those adjustments as they relate to the current Alternatives 2A and 6A. This effort will

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act as a relational bridge between the model results of the original twelve alternatives and the two revised alternatives. Concentrating our efforts and resources in this manner will minimize 1) the changes to the current draft IAFS text, tables, and figures, 2) the time required to submit the draft final IAFS, and 3) the expense necessary to properly respond to agency comments.

For your information, DON intends to continue negotiations with OCWD while we respond to regulatory agency concerns and develop the draft final IAFS. In an October 19, 1995, meeting, DON and OCWD agreed that OCWD would draft a proposed agreement after receipt of the draft IAFS and provide it to DON for review, probably sometime in December 1995. OCWD has not provided this draft, presumably out of concern raised by EPA's December 15, 1995, comments. DON plans to schedule a meeting with OCWD in the near future.

DON plans to continue to work with both the regulatory agency members and OCWD technical staff throughout the development of the draft final IAFS. Once the Department of Toxic Substances Control (DTSC) completes its review of the draft IAFS, DON will assure that the draft final IAFS addresses all critical concerns. The "decision tree" structure of the proposed plan and ROD allows our discussions with OCWD and our responsibilities under the FFA to both progress without unnecessary delays.

If you have any questions regarding our intended approach taking into account your comments, please contact our staff. For technical issues, please contact Mr. Andy Piszkin at (619) 532-2635, and for legal concerns, Mr. Rex Callaway at (619) 532-1162.

Sincerely,



W. A. DOS SANTOS
Commander, CEC, U.S. Navy
Environmental Officer
By direction of
the Commanding Officer

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