



BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

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

Document Control No.: CTO-0065/0171

File Code: 0214.1

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

DATE: June 5, 1996
CTO #: 0065
LOCATION: MCAS El Toro

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

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J. W. Kluesener, Operations Manager

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Final RFA Addendum for CTO-65, DTD May 29, 1996

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M065/01507

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CLEAN II Program
Bechtel Job No. 22214
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IN REPLY REFERENCE: CTO-0065/0171

June 3, 1996

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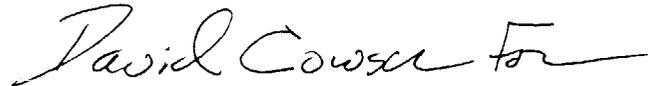
Subject: Document Review Comments and Responses
Final RFA Addendum for CTO-065, MCAS El Toro, California

Dear Mr. Kennedy:

Document review comments, concerning the above referenced report, were received from the following: SWDIV Environmental Division, U.S. EPA Region IX, and the State of California, Environmental Protection Agency, Department of Toxic Substance. Their comments have been addressed and, where appropriate were incorporated into the Final RFA Addendum report for CTO-065, MCAS El Toro, California. The revisions made to the report have not altered the conclusions or recommendations.

Please call me (619/686-8803) if you have any questions.

Very truly yours,



Jacques Lord
CTO Leader

JL/cg

cc: Distribution

Enclosure: Final RFA Addendum for CTO-065, MCAS El Toro, California



Bechtel National, Inc. Systems Engineers-Constructors



RESPONSE TO REGULATORY AGENCY COMMENTS
Phase II RI/FS Work Plan
Marine Corps Air Station (MCAS) El Toro, California

Originator: Jacques P. Lord
Date: June 3, 1996

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Correspondence From the U.S. Environment Protection Agency (Region IX) to Joseph Joyce/U.S. Navy.

February 27, 1996

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

Dear Mr. Joyce:

EPA has reviewed the "Draft Final Addendum to the RCRA Facility Assessment" for MCAS El Toro, received on January 2, 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.

COMMENT 1:

The BCT should discuss the most efficient means to incorporate these findings into the ongoing removal action and feasibility study process.

COMMENT 2:

The tables used throughout this report are very useful data presentation tools. In future reports, please include the Phase I data on the figures.

COMMENT 3: Page 1-1, Section 1.1;

Text is confusing. At NPL sites, such as El Toro, after sampling is completed as part of a RCRA assessment, these results are evaluated to determine if the areas assessed should be addressed via RCRA Corrective Action, CERCLA Removal Action or in the ongoing remedial investigation/feasibility studies.

RESPONSE 1:

BCT met and discussed the proposed recommendation. The recommendations presented in the Final Addendum Report reflect BCT comments as of that date (meeting minutes Chron. No. 0079/0136).

RESPONSE 2:

A memo has been circulated to the CLEAN II CTOLs, PMs, and Technical Editing to advise them of this comment (Chron. No. 0065/0151).

RESPONSE 3:

Text has been revised to clarify the point that Specific Corrective Actions will not be recommended. The Scope of the RFA Addendum report is to recommend either 'action' or 'no action', and not to specify the regulatory process, if one is called for. BCT agreement is documented in meeting minutes of 10 April 1996 (Chron. No. 0079/0136).



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COMMENT 4: Page 3-1;

The Navy is currently recalculating soils background levels. Please revise the text.

RESPONSE 4: Draft Final Addendum

Text is revised to address comment. Reference is made to the Draft Sites 2 and 17 Phase II Remedial Investigation Reports.

COMMENT 5: Page 3-4, Section 3.1.14;

Its more clear to state that the PCB sample, Location 007H7, had a detection above 200 µg/kg, however, the exact concentration is not known. This location could potentially have concentrations above the industrial PRG also. EPA agrees that further confirmation of PCB concentrations or removal action is required at this location.

RESPONSE 5: Draft Final Addendum

Text is revised to address comment. Confirmation sampling was done in April 1996 and the analytical results (location 007H7, Aroclor 1260 97 µg/kg) have been incorporated into the text. The recommendation is unchanged.

COMMENT 6: Page 3-7, 2nd paragraph

Please confirm whether thermal desorption is still proposed for use at MCAS El Toro.

RESPONSE 6: Draft Final Addendum

The RAC contractor has since installed an onsite exsitu bioremediation unit, rather than a thermal desorption unit, for remediation of petroleum hydrocarbons in soil.

COMMENT 7: Page 3-15, Section 3.5.4

The BCT should discuss the most efficient method to address the PCB levels at SWMU 88.

RESPONSE 7: Draft Final Addendum

The BCT met and discussed Removal Action recommendations (Chron. No. 0079/0136). The Recommended Action in this report reflects the consensus of that meeting and discussion. It is not within the Scope of Work for this CTO to recommend a specific Remedial Action. The objective was to recommend the need for further action or no further action. Specific methods are to be covered under the Remedial Action Contract.

COMMENT 8: Page 3-21, Section 3.8.4;

It does not appear correct to conclude that SVOCs were not detected below a depth of 10 feet. Section 3.8.2 states that samples were collected only to a depth of 8.5 feet bgs.

RESPONSE 8: Draft Final Addendum

It is correct. Existing CLEAN I data indicate PAHs detected at 10 ft. but not below this depth. Text is revised to clarify the point.



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Correspondence From the U.S. Marine Corps to Assistant Chief of Staff, Environment and Safety (IAU)

Subject: DRAFT FINAL ADDENDUM TO THE RCRA FACILITY ASSESSMENT AT MCAS EL TORO

Ref: (a) Your ltr 6296 of 5 Jan 96

Encl: (1) Review comments of 25 Jan 96

1. Thank you for the opportunity to review the subject document. In response to reference (a), review comments are forwarded as enclosure (1). We were uncomfortable with the recommendations for SWMUs 46 & 244 and would request your staff re-evaluate the proposals.

2. Should you have any questions regarding this matter, our point of contact for this action is Mr. Edward J. Rumsey at (714) 726-2270.

COMMENT 1: Paragraph 3.4.4

Lets re-evaluate the recommendation. Vertical extent of the fuel contamination is very shallow. Water table in very deep. Current political/scientific climate is to reduce the amount of effort expended upon contaminates that pose little threat to the drinking water and nature will self remediate. I believe SWMU 46 fits this criteria. Do we really have to remediate. Wouldn't a NFA determination be more appropriate. That would be consistent with the LUFT guidelines which do not govern.

COMMENT 2: Paragraph 3.10.1

The recommendation was based upon "residential" PRGs. Would "industrial" PRGs change the recommendation? If so, why is it not appropriate to apply "Industrial" standards?

RESPONSE 1:

Recommendation for SWMU 46 was discussed with the BCT and then Remedial Technical Specialist of SWDIV, and the consensus was to pursue the removal rather than advocate no action. Removal will close the issues, whereas no further action requires monitoring and could delay reuse.

RESPONSE 2:

The final reuse for MCAS El Toro is a controversial community issue and not resolved, despite several proposition elections. Residential and industrial reuse can both be options by remediating to a health-based cancer risk level of 10^{-6} with little to no cost difference between the options. Remember that an "industrial" cleanup action will likely leave the door open for future contention, while a 10^{-6} cleanup opens the site to any reuse option and closes environmental concerns.



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Other General Comments

COMMENT 3:

There is a recent announcement given by the state Water Resources Control Board to its nine regional offices to stop active cleanup at all underground spill sites located more than 250 feet from the drinking well. How far this new directive changes (sic) our cleanup effort and reduces our cost? This needs to be explored before the present document is finalized.

Recent political climate is to reduce unnecessary cost if there is no impact to human health. This factor needs to be reevaluated.

RESPONSE 3: Draft Final Addendum

Please see responses to Comments 1 and 2. Text has been revised to clarify the point that Specific Corrective Actions will not be recommended. The Scope of the RFA Addendum report is to recommend either 'action' or 'no action', and not to specify the regulatory process, if one is called for. BCT agreement is documented in meeting minutes of 10 April 1996 (Chron. No. 0079/0136).



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Correspondence from State of California Environmental Protection Agency Department of Toxic Substance to U.S. Navy, signed Tayseer Mahmoud.

February 23, 1996

**Mr. Joseph Joyce
 BRAC Environmental Coordinator
 U.S. Marine Corps Air Station - El Toro
 P. O. Box 95001
 Santa Ana, California 92709-5001**

Dear Mr. Joyce:

Subject: Comments on Draft Final Addendum to the RCRA Facility Assessment, Marine Corps Air Station (MCAS) El Toro (Volume 6 of the Final RFA Report)

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated December 1995. A final RCRA Facility Assessment (RFA) report consisting of five volumes was issued in July 1993. DTSC provided comments that certain Solid Waste Management Units (SWMUs), Areas of Concern (AOCs) and Temporary Accumulation Areas (TAAs) would require additional evaluation to satisfy the DTSC conditional concurrence of the final RFA. The draft final Addendum to the RFA (Volume 6) represents the response to the DTSC Comments on the original RFA final report.

The enclosed comments are directed to the Marine Corps Air Station El Toro and their consultants. Overall, the report is well written. A few clarifications and modifications are needed as outlined in the general and specific comments below. Please incorporate the comments where appropriate. If you have any questions, please contact me at (310) 590-4891.

General Comments

COMMENT 1:

DTSC agrees with the recommendation that the following SWMUs require either additional investigation or remedial actions:

SWMU 7 - Transformer Storage Area

RESPONSE 1: Draft Final Addendum

Text has been revised to clarify the point that Specific Corrective Actions will not be recommended. The Scope of the RFA Addendum report is to recommend either 'action' or 'no action', and not to specify the regulatory process, if one is called for. This concern was addressed and the BCT consensus documented in Meeting minutes dated 10 April 1996 (Chron No. 0079/0136).



RESPONSE TO REGULATORY AGENCY COMMENTS
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SWMU 46 - Vehicle Maintenance and Parking; DRMO Storage Yard

SWMU 88 - Drum Storage Area; Building 1601

SWMU 131 - Engine Test Cell; Building 447

SWMU 244 - PCB Spill Area; Building 244

DTSC is concerned about the recommendation to transfer the above SWMUs to the RAC for removal actions. The goal of conducting the RFA was to identify SWMUs, AOCs, and TAAs that have evidence of a release or suspected release of hazardous substances or petroleum products. If contamination is discovered as a result of a site investigation or limited sampling, that SWMU, AOC or TAA would be transferred into the basewide remedial activities being performed under the Base Realignment and Closure process. This report recommends that the above SWMUs will be remediated under a "RCRA stabilization initiative." Please be aware that conducting any type of RCRA remedial activities will result in DTSC oversight under RCRA Corrective Action. The next course of activity after the RFA in a RCRA Corrective action is the preparation of a RCRA Facility Investigation (RFI), followed by a Corrective Measure Study (CMS). If the Department of Navy intends to continue with RCRA remedial activities, a RFI and CMS must be submitted for DTSC approval prior to any remedial activities.

COMMENT 2: CLEANUP LEVELS

The remediation goals of the SWMUs should be consistent with the basewide remedial activities and the future reuse of the Station. The BRAC Cleanup Team should discuss the best method to incorporate the SWMUs into the basewide remediation strategy. The critical issue is the selection of a PCB action level. The industrial PRG, as being used for decisions regarding RAC cleanup appears overly conservative and is inconsistent with the PCB action level specified in the CLEAN II Draft Action Memo for unit 2 Site 19 for removal actions. If current and projected reuse scenarios are similar under both documents then action levels should be consistent, i.e. equivalent to the 5 mg/kg level.

COMMENT 3:

DTSC agrees with the recommendation that no further investigation of the following SWMUs are required at this time:

RESPONSE 2: Draft Final Addendum

PCB action levels are higher at Unit 2 Site 19 because the PCBs are at depth. The PCBs at SWMU 88 are surficial and, therefore, pose a relatively higher human-health risk. Hence the decision to recommend more conservative cleanup levels.

Specific remediation recommendations, however, have now been removed from this Report in accordance with BCT meeting held 10 April 1996 (Chron. No. 0079/0136).

RESPONSE 3: Draft Final Addendum

No response necessary.



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SWMU 9

SWMU 165

SWMU 171

SWMU 229

SWMU 260

SWMU 267

The SWMUs should be listed in the BRAC Cleanup Plan and a site inspection scheduled as the units are discontinued to verify that a release has not occurred after the issuance of this report.

COMMENT 4:

DTSC cannot approve a no further investigation decision on SWMU 39 and SWMU 264 until the following information is provided:

- a. The borehole logs and soil sample analyses for SWMU 39 (See specific comment numbers 31 and 33 below).
- b. A copy of the referenced document (Lee 1994) for SWMU 264 (See specific comment number 41 below).

COMMENT 5:

DTSC agrees with the recommendation to remove the storage lockers from TAA 7.

RESPONSE 4: Draft Final Addendum

Text has been modified to address the comment.

RESPONSE 5: Draft Final Addendum

No response necessary.



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COMMENT 6:

DTSC agrees with the proposed actions for the Temporary Accumulation Areas listed in Table 1-2. The BRAC Cleanup Plan should include the proposed actions for each TAA.

COMMENT 7:

There are several discrepancies between the borehole logs in Appendix B and the soil analytical data summary in Appendix D. The data summary table contains sample dates and sample depths that conflict with the borehole logs. Listed below are two examples:

- a. Borehole log for hole number 088H9 indicates that sample number 0650026 was collected at 0.7 - .2 feet below ground surface (bgs). The total depth of the hole is listed as 1.2 feet. The data summary table in Appendix D indicates that the "sample bottom depth" was 14 feet.
- b. Borehole log for hole number 088H5 indicates a sample number 0650083 collected on June 12, 1995. The data summary table shows the analysis of a sample 088H5, Sample ID Number 0650175, collected on August 24, 1995.

All the inconsistencies between the borehole logs and the data summary table need to be corrected or explained.

COMMENT 8:

Include the CLEAN I analytical results on the figures along with the CLEAN II results for ease of comparison.

COMMENT 9:

The term action level appears frequently and seems to be applied indiscriminately. Review the text, define the term and correct as necessary.

RESPONSE 6 Draft Final Addendum

No response necessary. CTOL of CTO-65 coordinated with the CTOL for CTO-103 during revisions to the BRAC Cleanup Plan for 1996.

RESPONSE 7 Draft Final Addendum

Text and borehole logs have been reconciled to address comment.

RESPONSE 8: Draft Final Addendum

Figures have been revised as appropriate.

RESPONSE 9: Draft Final Addendum

Text is revised to address the comment.



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SPECIFIC COMMENTS

COMMENT 10: Page 1-1, First paragraph

The RFA was performed at areas of concern at MCAS El Toro, not a particular site. The word site has an IRP connotation and should be used judiciously.

RESPONSE 10: Draft Final Addendum

Text is revised to address the comment.

COMMENT 11: Page 1-1, First paragraph

The first paragraph is missing a discussion of the CLEAN II work. As written it does not serve as an adequate introduction for this report and should probably be combined with Section 1.1.

RESPONSE 11: Draft Final Addendum

Text is revised to address the comment.

COMMENT 12: Page 1-1, Section 1.1

Since PAHs are considered SVOCs, the text is redundant in the second paragraph, first sentence.

RESPONSE 12: Draft Final Addendum

Text is revised to address the comment.

COMMENT 13: Page 1-1, Section 1.1, Second paragraph

MCAS El Toro is an NPL site but it is not funded by the Superfund Program. All CERCLA restoration funds are obtained through the BRAC III accounts of the DOD.

RESPONSE 13: Draft Final Addendum

Text is revised to reflect that once El Toro was an NPL site, it would be inappropriate to perform assessments under CERCLA-regardless of funding sources - and so subsequent assessment was performed using RCRA guidance.

COMMENT 14: Page 1-1, Section 1.1, Second paragraph

The intent of the statement, "However, since MCAS El Toro is already a listed NPL site, it was inappropriate to fund additional assessment activities under CERCLA," is not clear. Please provide an explanation.

RESPONSE 14: Draft Final Addendum

See Response 13.

COMMENT 15: Page 1-12, Figure 1-1 RFA Activities Decision Rules

The box that contains the text "MOVE TO THE RAC CONTRACTOR" should be replaced with wording similar to "Move to the BRAC Cleanup Process."

RESPONSE 15: Draft Final Addendum

Figure is revised to reflect comment's suggestion.



RESPONSE TO REGULATORY AGENCY COMMENTS
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COMMENT 16: Page 1-13, Section 1.5 VARIANCES Clarify the meaning of the expression "...sampling approach was compromised by one boring..." Does this mean that one boring was eliminated or does it mean that its statistically determined location was relocated?	RESPONSE 16: Draft Final Addendum The latter is true.
COMMENT 17: Page 2-3, Section 2.1.3 Decontamination In the last paragraph, second sentence, there is a typographical error in the spelling of <u>United</u> States Environmental Protection Agency. Also, "proscribe" is the opposite of the intent of the sentence.	RESPONSE 17: Draft Final Addendum The errors are corrected.
COMMENT 18: Page 3-1, Section 3 Add a reference to the EPA QA/G-4 QAMS 1994 Final Guidance for the Data Quality Objective Process.	RESPONSE 18: Draft Final Addendum Text is revised to address comment.
COMMENT 19: Page 3-1, Section 3, Second paragraph Since this is a RFA, shouldn't the reference be to contaminant of potential concern, not contaminants of concern?	RESPONSE 19: Draft Final Addendum Text is revised to address comment.
COMMENT 20: Page 3-1, Section 3, Third paragraph Add a reference to the 2nd half 1995 USEPA Region IX Residential PRGs.	RESPONSE 20: Draft Final Addendum Text is revised to address comment.
COMMENT 21: Page 3-1, Section 3, Third paragraph Replace the indirect reference to CLEAN I with the actual primary source document, i.e., the Final RFA Report issued by CLEAN I.	RESPONSE 21: Draft Final Addendum Text is revised to address comment.
COMMENT 22: Page 3-1, Section 3, Third paragraph Maintain consistency with the final background levels which are being recalculated by the Marine Corps under CLEAN II.	RESPONSE 22: Draft Final Addendum Text is revised to address comment.



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COMMENT 23: Page 3-2, The Table

Identify the table with a table number and separate title.

RESPONSE 23: Draft Final Addendum

The table and two graphs shown in Figure 3-1 are integrated much like the ensuing figures in Section 3, and to separate 3-1 into Tables and Figures defeats the concise nature of the presented data.

COMMENT 24: Page 3-3, Section 3.1.1 DQOs For SWMU 7, First paragraph, last sentence.

Identify the group from which the off-site confirmation PCB samples were selected. That is, was it the total collected or a percentage of just the positive hits?

RESPONSE 24: Draft Final Addendum

Text is revised to reflect comments.

COMMENT 25: Page 3-3, Section 3.1.1 DQOs For SWMU 7, Second paragraph, last sentence

What is the intent of "...samples could have been collected..."? Were the samples collected or not?

RESPONSE 25: Draft Final Addendum

Text is revised to read "was collected".

COMMENT 26: Page 3-3, Section 3.1.1 DQOs For SWMU 7, Third paragraph, last sentence

The statement "...were to be performed...." is confusing. Were the analyses performed as indicated?

RESPONSE 26: Draft Final Addendum

Text is revised to read "were performed".

COMMENT 27: Page 3-3, Third paragraph and seventh paragraph

In the 3rd paragraph, an "action level" for "petroleum contamination" of 1,000 mg/kg is defined. In the 7th paragraph, the text notes that "Diesel was detected below action levels (>15,000 microgram/kilogram)..." Also see page 3-6, "Diesel was detected above action levels (>100,000 microgram/kilogram)..." Furthermore, on page 3-11, Section 3.4.2, the text states that "Diesel/gasoline was detected below action limits in one sample (>15 text states that "Diesel/gasoline was detected below action limits in one sample (>15 mg/kg and <100 mg/kg)." Each of these statements is seemingly in conflict with each other.

RESPONSE 27: Draft Final Addendum

Text is revised to be consistent with Work Plan and Established DQOs.

What is the action level and what is the meaning of "...>15,000..."? Is the measured diesel greater than 15,000?



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COMMENT 28: Page 3-4, Section 3.1.4 Recommendations

The recommendations in this report related to PCBs are not consistent with the Marine Corps current position on PCB action levels. The Draft Action memo for Unit 2 Site 19 identified a level of 5 mg/kg.

RESPONSE 28: Draft Final Addendum

Unit 2 Site 19 PCBs are not a surface contaminant and present different exposure scenarios than the PCBs at SWMU 88, 7, or 244. At any rate, BCT meeting of 10 April 1996 recommended that the RFA Addendum recommend action or no action but not specific remedial strategies (Chron. No. 0079/0136)..

COMMENT 29: Page 3-6, Section 3.2.1 DQOs For SWMU 9, First paragraph, third sentence

In the first paragraph, third sentence, the referenced figure (Figure 3-2) should be revised to Figure 3-3.

RESPONSE 29: Draft Final Addendum

Text is revised to incorporate comment.

COMMENT 30: Page 3-7, Section 3.2.2 Results, Second paragraph

Confirm that thermal desorption for diesel is planned for MCAS El Toro. Recent discussions have indicated that the RAC will construct a landfarming biotreatment system at the Station.

RESPONSE 30: Draft Final Addendum

Reference to thermal desorption is eliminated from the text. An exsitu bioremediation well has been built at El Toro.

COMMENT 31: Page 3-9, Section 3.3.1 DQOs For SWMU 39

Include a table which identifies the applicable action levels from the FSP. See also the second paragraph of Section 3.4.1.

RESPONSE 31: Draft Final Addendum

Text has been revised to refer to the DQO discussion in Section 3.1.1, and the borehole log from 039H3 is included (Appendix B).

DTSC's comments on the final RFA report dated January 24, 1994 ("Appendix C) indicates that soil samples were collected from an angle boring. Were the soil samples collected for this report (borehole 039H3) above the location of the potential release of SVOCs and PCBs detected in auger boring 39A1? The report did not contain the borehole log for SWMU 39 and only the soil analysis for the sample collected at 8.5 feet. Please provide the borehole log and all soil sample analyses for SWMU 39.

COMMENT 32: Page 3-9, Section 3.3.2 Results, First paragraph, fourth sentence.

The report should clarify the meaning of "applicable" PRGs.

RESPONSE 32: Draft Final Addendum

"Applicable" is revised to "Residential Soil".

COMMENT 33: Page 3-10, Figure 3-4 Sample Location and Results - SWMU 39.

RESPONSE 33: Draft Final Addendum



RESPONSE TO REGULATORY AGENCY COMMENTS
Phase II RI/FS Work Plan
Marine Corps Air Station (MCAS) El Toro, California

Originator: Jacques P. Lord
 Date: June 3, 1996

CLEAN II PROGRAM
 Bechtel Job No. 22214
 Contract No. N68-711-92-D-4670
 CTO-0065/0171
 File Code: 0321

Below the table is an asterisk note that one result from off-site analyses reported total PAHs at 459 ppb. Please include the analysis of this sample in the data summary table in Appendix D. Also include the missing borehole log for SWMU 39 in Appendix B.

The borehole log is included in Appendix B. The results are in Appendix D as sample 0650018.

COMMENT 34: Page 3-12, Section 3.4.4 Recommendations

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The first statement refers to action levels for diesel/gasoline as part of the final recommendation for a RCRA stabilization initiative; however, it is not clear what the action limits are.

Text is revised for clarity.

COMMENT 35: Page 3-14, Section 3.5.2 Results, First paragraph

RESPONSE 35: Draft Final Addendum

In the first paragraph, the text states "thirty-two samples were tested for PCBs using the immunoassay kit in the field..." In the second paragraph the text states that "PCBs were not detected by immunoassay in 44 of the samples..." There appears to be a discrepancy here.

Text has been revised to eliminate discrepancies.

COMMENT 36: Page 3-14, Section 3.5.2 Results, Second paragraph

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The text identifies a PCB "...standard of 200 [microgram/kilogram] by immunoassay." The term "standard" apparently refers to the method detection limit of the immunoassay kits. Confirm and correct.

Text is revised to reflect comment.

COMMENT 37: Page , Section 3.5.2 Results, Fourth paragraph

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The maximum concentration reported in this document is 16 mg/kg not 14 mg/kg. Also see Section 3.5.4 the second sentence.

Text is revised to reflect comment.



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COMMENT 38: Page 3-15, Section 3.5.4 Recommendations

The recommendations in this report related to PCBs are not consistent with the Marine Corps current position on PCB action levels. The Draft Action Memo for Unit 2 Site 19 identified a level of 5 mg/kg.

Correct the text. The industrial PRG for PCBs is 340 microgram/kilogram not 330.

COMMENT 39: Page 3-23, Section 3.9.1 DQOs For SWMU 229, Second sentence.

The text references Figure 3-8, which is a figure of SWMU 171.

COMMENT 40: Figure 3-9 Sample Locations and Results - SWMU 260

Below the table is an asterisk note that off-site confirmation was 130,000 mg/kg TPH - diesel. Shouldn't this be 130,000 µg/kg.?

COMMENT 41: Page 3-26, Section 3.12.1 DQOs For SWMU 264, Fourth sentence.

In the fourth sentence, a reference is made to a document by Lee, 1994. Please include this document in the report.

COMMENT 42: Appendix D, Second paragraph, first sentence

The descriptor SDG refers to "sample delivery group."

COMMENT 43: Appendix D, Second paragraph.

Replace the word proscribed with the correct temp and identify which analyte exceeded its holding time and likewise confirm that it was a single analyte and not an entire sample which exceeded the holding time.

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Text is revised to reflect comment.

RESPONSE 39: Draft Final Addendum

Text is revised.

RESPONSE 40: Draft Final Addendum

Yes, units have been corrected in the text.

RESPONSE 41: Draft Final Addendum

Document is included in Appendix E.

RESPONSE 42: Draft Final Addendum

Text is revised.

RESPONSE 43: Draft Final Addendum

Text is confirmed and clarified.