



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

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MCAS EL TORO
SSIC # 5090.3

March 21, 1995

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

Dear Mr. Joyce:

EPA has reviewed the "Draft Addendum to the RCRA Facility Assessment Work Plan," prepared for Marine Corps Air Station, El Toro, California, received on 1/12/95. Please address the enclosed comments (Enclosure A) in the draft final report. We would like to meet with you regarding these comments as well as the overall approach for the RFA sites. In order to avoid duplicative comments for CTO-0059 documents either already reviewed or currently under review, EPA will address review of Attachments B-E as follows:

Attachment B: EPA will submit comprehensive comments on both Attachment B, and the CTO-0059 "Draft Quality Assurance Project Plan (QAPP)" the week of April 3, 1995. Limited EPA comments addressing Attachment B are included in Enclosure A.

Attachment C: Please refer to EPA's 1/24/95 comments on the CTO-0059 "Draft Data Management Plan" to address Attachment C. The limited changes in the document are acknowledged. It is noted on Page C3-5 that "existing graphic data files needed for the GIS database will be translated and imported into ARC/INFO as determined in data transfer meeting with the CLEAN I contractor held in September 1994." Please provide the completion date for this task.

Attachment D: Comments on the "Draft Investigation-Derived Waste Management Plan (IDWMP), Attachment D" will be consolidated with the comments on the "draft IDWMP," CTO-0059, and forwarded the week of March 27, 1995.

Attachment E: EPA will not be commenting on Attachment E, the "draft Health and Safety Plan."

If you have any questions, I can be reached at (415) 744-2389.

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. Juan Jimenez, DTSC
Mr. Larry Vitale, RWQCB
Mr. Wayne Lee, MCAS El Toro
Mr. Jason Ashman, SW DIV
Mr. Dante Tedaldi, Bechtel

ENCLOSURE A

EPA COMMENTS ON THE "DRAFT ADDENDUM TO THE RCRA FACILITY ASSESSMENT WORK PLAN"

GENERAL COMMENTS

- 1) The following issues should be discussed in a conference call or meeting:
 - o The collection of opportunity samples, including criteria, purpose and sample collection methods.
 - o SWMU-specific discussions indicate that "additional samples will be collected until sufficient data exist to make a recommendation." It is imperative that the Navy and regulators agree with the objectives of the proposed sampling to avoid further field efforts at a later date.
 - o The percentage of samples sent off-site for confirmation analyses.
 - o The approach for Group 1 and 2 Temporary Accumulation Areas (TAA)s.
- 2) Inconsistencies in the approach towards field screening for inorganics should be corrected.
- 3) Discussions regarding the use of immunoassay kits should be site specific and data from prior investigations should support the use of these kits in terms of the appropriateness of the indicator analytes and their detection limits.
- 4) The workplan and attachments contain inaccuracies regarding the elements of the US EPA Contract Laboratory Program (CLP).

SPECIFIC COMMENTS

- 1) Page 1-2, 5th, 6th Paragraph; The correct reference is the prime contractor, Jacobs Engineering Group, instead of CH2MHill.
- 2) Page 1-2, 6th ¶ BCP stands for BRAC Cleanup Plan, not Base Closure Plan.

- 3) Page 1-3, 2nd ¶; The opportunity samples do not appear to represent a viable means for the evaluation of potential contamination. For example, steam blasting to collect an aqueous sample of SVOCs from a solid surface is not recommended.
- 4) Page 1-3, last ¶; The WPA will not address all previously submitted DTSC comments on the RFA. What are the comments that are addressed and when will the others be addressed? When will a comment resolution document be prepared?
- 5) Page 1-5, Table 1-1; Please use the definitive unit, e.g., mg/kg or mg/L.
- 6) Page 1-5, Table 1-1; Please use the term CRDL correctly here and throughout the report. CRDL stands for Contract Required Detection Limit and is applicable only to CLP analyses for inorganics. CRQL represents Contract Required Quantitation Limit and is applicable only to CLP analyses for organics.
- 7) Page 1-5, Table 1-1; Do not include laboratory data qualifiers, e.g. J, without an appropriate explanation as a footnote.
- 8) Page 1-5, Table 1-1; Do not use the term action level for TPH without including rationale for use and numerical value.
- 9) Page 1-6, Table 1-1; For AOC 264, Rephrase and clarify the statement "Additional sampling has been conducted and (sic) analyzed." If so, where is the review and interpretation of these data?
- 10) Page 3-2, Table 3-1; The statistical concept of confidence is different than that of probability and therefore, the terms should never be used interchangeably as they are in this table. Based on the hot spot presentation in the text, the correct term for this table is probability, not confidence.
- 11) Page 3-5, 3rd ¶; When referring to types of analyses be definitive. Do not simply state screening or (sic) off-site. State field screening or off-site analyses.
- 12) Page 3-5, 4th ¶; Provide support for the assumption that two samples for geotechnical analyses are adequate based on the apparent differences between AOCs and SWMUs.
- 13) Page 3-5; Provide a base map/figure which identifies the

locations of the 11 AOCs/SWMUs to be sampled using this effort.

- 14) Page 3-6; After the first mention of "opportunity " sampling, remove the quotes.
- 15) Page 3-6; The purpose of the opportunity sampling is "...to support the reevaluation of the decontamination/removal strategy..." Explain how these samples will be used for this purpose because apparently they will only indicate the resultant concentration of contaminants in decon water, but not of the original material. Also, the stated purpose does not appear to agree with the data usage specified on page 1-3, end of 2nd paragraph.
- 16) Page 3-6, last ¶; The discussion does not specify how confirmation will be assessed. This missing information is critical to an evaluation of the acceptability of this approach.
- 17) Page 3-6, last ¶; TCL stands for Target Compound List, not total compound list. TAL stands for Target Analyte List, not total analyte list.
- 18) Page 3-7, 1st ¶; Be consistent with terminology. In this paragraph the text states "...confirmation split samples..." In other places the term "...duplicate samples.." is used. Is there a perceived difference between field duplicates and confirmation splits? If not, correct the text.

ATTACHMENT A

- 19) Please correct the following acronyms; HPLC represents High Performance (or Pressure) Liquid Chromatography, not High Purity Liquid Chromatography and United States Environmental Protection Agency. Also, numerous acronyms identified and used frequently in the text are absent from the list. For example, CLP, CRQL and CRDL.
- 20) Page A-1-7, 1st ¶; Do not use catch-all expressions such as "...etc.'" Be definitive when referring to what will be sampled or collected.
- 21) Page A1-8, last ¶; The final RFA report was issued by CLEAN I, not CLEAN II.
- 22) Page A1-91; The figure numbers should be consistent with the page and section numbering protocol; therefore, the correct identification would be Figure A1-1.

- 23) Page A4-1; Category 1 sites: Do Category 1 sites have a confirmed release? Please clarify "systematic sampling"?
- 24) Page A4-1; Also, typographical error for Category 2 SWMUs ("a or").
- 25) Page A4-1; Please indicate if "access to sampling sites" is currently a problem, or is this just included as a planning contingency?
- 26) Page A4-3; Provide a one page summary table of the DQOs for all AOCs/SWMUs.
- 27) Page A4-3, last sentence, 1st ¶; Delete the last sentence. The figure referenced does not mention a 10 foot diameter hot spot, nor is a 10 foot hot spot approach consistently applied for all DQOs at all SWMUs/AOCs.
- 28) Page A4-3, last ¶ and following pages; Considerable confusion can result from the interchange of the expressions TFH and PHC and PAHs. Be definitive about what is being examined and measured. Do the authors believe that the PHC test kit is adequate for the assessment of PAHs and TPH or TFH?
- 29) Page A4-3, SWMU 7; Clarify if other stained locations, other than that near Boring 007H1 have been observed. Additionally, clarify if any samples will be analyzed using Method 624-M TCL/SOW.
 SWMU 9; As discussed in General Comments the appropriateness of the immunoassay kits is dependent upon the contaminants expected and their detection limits. As noted in General Comments, EPA would like to clarify the phrase, "sufficient data exist to make a recommendation."
- 30) Page A4-6, SWMU 39; Recommend that samples are collected at two locations near Boring 39A1.
 SWMU 88; Recommend that samples are collected at two locations near Boring 88A2.
- 31) Page A4-10; SWMUs 131 and 244; Provide summary of RFA data. Give date of actual sampling and contaminant levels.
 SWMU 171; Please provide a description of the sump and summary of any sampling results, if available.
- 32) Page A4-10, last ¶ 2nd to last sentence. Correct the erroneous sentence. Statistically, only one sample may be required to provide a 95-percent probability of detecting a release. A minimum of three locations is not necessary. In this application, the number of samples are a function of confidence, not probability.
- 33) Page A4-17, 1st ¶; The description of field screening for inorganics is inconsistent with the discussion in the QAPP. The QAPP states that ion-selective electrodes may be used in

addition of XRF.

- 34) Page A4-19; When will the map be provided?
- 35) Page A4-21; See Comment Number 15.
- 36) Page A5-1; The methods listed are inconsistent for soil and water and applicable methods for each medium should be listed.
- 37) Page A5-1, last ¶; The CLEAN II Program does not require that laboratory subcontractors be participants in the USEPA contract laboratory program. However, all CLEAN II Program laboratories are capable of providing CLP-equivalent data reporting packages and implementing CLP analytical statements of work.
- 38) Page A5-2; Include an explanation of the nomenclature for the Sample Numbering System.
- 39) Page A5-4; Replace "Only if needed or DTSC insists." with "If required or requested by DTSC or other regulatory agencies."
- 40) Page A6-1; It is confusing to use the terms "Relevant and appropriate" for the applicability of the Standard Operating Procedures.
- 41) Page A6-1; Ongoing discussions between EPA and DTSC representatives have been occurring to resolve the issue of Bechtel's SOPs. Until this issue is resolved, include sufficient description of each referenced SOP. Additionally, the total number of SOPs identified in this section (four SOPs) does not correspond to those listed on page B6-3 (seven SOPs).
- 42) Page A6-2, 3rd ¶; The text states that the achievement of DQOs can be documented for each sample through the review of the SSSF. Based on the content of the SSSF, the attainment of this objective is impossible. It is suggested that the SSSF be modified to include a table listing the sample ID and the cross-referenced DQOs.
- 43) Page A6-2, 4th ¶; See Comment Number 19.

ATTACHMENT B

- 44) Page B3-2; 2nd ¶ There is no "...maximum detection level..." identified for any of the field screening nor any of the off-site analytical methods. It appears that the authors are referring to detection limits in Table 3-1; however, sample dilutions would increase the detection limit for off-site analytical methods, not decrease the detection limit.
- 45) Page B3-3; It is unclear if the "Project Required Detection Limits" are equivalent to the listed "Detection Limit(s)." It appears that the listed "Detection Limit(s)" are the expected achievable limits of each method, not what may be

required based on regulatory criteria.

- 46) Page B3-9; 1st ¶ There are two errors in the text which states that 10 percent positives and 5 percent nondetects will be sent to a CLP laboratory for analyses. First, see Comment Number 37 regarding use of the terminology CLP laboratory. Second, on page 3-7 the text states that 15 percent positives and 10 percent nondetects will be sent to an off-site laboratory for confirmation.
- 47) Page B3-9, last ¶; The text states that XRF or ICP and ion selective electrodes will be used for field screening of inorganics. However, nowhere in the preceding discussions of inorganic field screening was the use of ICP mentioned. A review of the text which follows on the next page indicates that ICP will not be used in the field, rather it will be used for off-site fixed laboratory confirmation analyses (see page B3-10, 1st and 2nd paragraphs).
- 48) Page B3-11; 2nd paragraph conflicts with text on page A5-1 regarding the requirement to use CLP methods if using NEESA Level D analyses.
- 49) Page B3-13, Table 3-3; For the parameter pH, correct the entry "pH<screening" and delete "Immunoassay." Also, there are no specified RPD and %R values for pH measurement.