



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

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MCAS EL TORO  
SSIC # 5090.3

July 22, 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 Final Phase II Remedial Investigation [RI] Report, Operable Unit 2A - Site 24," for MCAS El Toro, received on June 20, 1996. The following comments have been separated into two categories-comments which require revision in the Final OU 2A RI Report and comments which may be addressed in the Draft and Draft Final OU 2A Feasibility Study (FS) Reports:

**Comments to be addressed in the Final OU 2A RI Report**

1) We appreciate the addition of the groundwater inorganics tables to Chapter 6. However, further discussion should be added in the Executive Summary and Chapter 6 clarifying that the OU 1 RI Report included the risk assessment for base and off-base inorganics, which appear to be naturally occurring. Specifically, the following pages should include greater detail: page ES-1, paragraph 4; page ES-6, paragraph 3; page 6-2, paragraph 1. Additionally, please provide a footnote for "Regulatory Level" in Table 4-16.

2) Section 4.2.4.2. Vertical Characterization, page 4-78, fourth paragraph; EPA does not agree with the bolded phrase in the following sentence: "Beneath the **fairly uniform** TCE concentrations in the upper 40 feet of the shallow groundwater unit are silt and clay beds." Please delete.

**Comments to be addressed in the Draft and Draft Final OU 2A FS Reports**

1) The BCT has discussed some further areas of delineation which can occur in the remedial design phase. Please carry forward the following three areas in the Draft and Draft Final OU 2A FS Reports: a) additional borings which assess the groundwater approximately 180 feet bgs, under Building 297, b)

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horizontal delineation upgradient of the main VOC source area near Buildings 296, and c) additional monitoring wells upgradient of 18\_PS3.

2) The isoconcentration contours should be modified as discussed in BCT meetings. The text should continue to discuss concentrations below the regulatory level, the Maximum Contaminant Level (MCL); however, the plume maps should contour starting with the MCLs. Additionally, a few of the contours do not appear correct. Please recheck the monitoring well concentrations within each concentration contour. For example, monitoring location Well 18\_MCAS02- is included incorrectly in the 15-25 ppb concentration contour (Figure 4-13).

3) Section 4.2.3. Regional Groundwater Conditions, page 4-61; For the record, EPA does not agree that the data presented supports the hypotheses discussed with regard to Bee Canyon Wash. The text requires no revision, however, as these hypotheses are not presented as fully supportable.

4) Section 4.2.4.2; The new combined cross-sections are useful for the RI, however, for the Draft and Draft Final FS Reports, please increase the number of groundwater contour intervals on each cross-section. It is acceptable to use data from hydropunch data as well as groundwater monitoring data from different sampling events.

If you have any questions, I can be reached at 415/744-2368.

Sincerely,



Bonnie Arthur  
Remedial Project Manager  
Federal Facilities Cleanup Office

cc: Mr. Tayseer Mahmoud, DTSC  
Mr. Larry Vitale, RWQCB  
Mr. Dante Tedaldi, Bechtel  
✓ Mr. Andy Piszkin, Southwest Div.