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MCAS EL TORO
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October 15, 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 forwarded comments on the "Draft Phase II Feasibility Study-Operable Unit 2A Report" on October 11, 1996. The attached comments (Enclosure A) are additional comments prepared by EPA legal counsel. If you have any questions regarding these comments, I can be reached at 415/744-2368.

Sincerely,

A handwritten signature in cursive script that reads "Bonnie Arthur".

Bonnie Arthur
Remedial Project Manager
Federal Facilities Cleanup Office

cc: Tayseer Mahmoud, DTSC
Larry Vitale, RWQCB
Andy Piszkin, Southwest Div.

October 15, 1996

MEMORANDUM

To: Bonnie Arthur
RPM, MCAS El Toro

Fr: Thelma Estrada
ORC

Re: Draft Phase II Feasibility Study, OU-2A

I finished reviewing the above document and the following are my comments:

GENERAL COMMENT:

Overall, the document was well-written and well-organized. The ARARs discussion was particularly well-done - it was thorough, well-reasoned, and specifically tailored to the chemicals/locations/actions on site. In other words, it avoids the general pitfall of ARARs discussion which is to have a laundry list of the whole universe of ARARs, without a clear explanation of when these requirements would be ARARs.

SPECIFIC COMMENTS:

1. p.ii: third full paragraph, last sentence - states that offstation, the maximum reported TCE concentration is 35 micrograms per liter. Somewhere in the document, I think it states 34 micrograms per liter.
2. p.iv: second bullet under Vadose Zone - states that vadose zone remediation will continue until the average voc soil gas concentrations are below the threshold concentration capable of contaminating groundwater above the mcls. Question: where will this be measured and how?
3. p.iv-v: under remedial action objectives for groundwater, it doesn't make it clear that the groundwater in the shallow unit and in the principal aquifer will be cleaned up to mcls and that groundwater which will be reinjected will be treated to non-detect levels.
4. p.vi: third full paragraph, second sentence - states that alternative 6a and 10 will increase the mobility of TCE into deeper groundwater units. Why is this the case?
5. p.1-7: section 1.3 - mentions for the first time (and I believe the last time) site 25 as part of OU-2A. Therefore, its not clear to me whether site 25 was evaluated and is considered part of OU-2A.
6. p.1-8: second to the last sentence in full paragraph in section 1.32 - it isn't clear to me what we mean in the sentence that reads "The dividing line that separates Ou-1 and site 24 is

approximated by the 5 ug/l TCE contour in the southwestern portion of the Station." Please clarify.

7. p.2-5: under remedial action objectives for groundwater - states as one of the objectives is to ensure the continued beneficial use of groundwater in the principal aquifer. It doesn't say how this will be accomplished.

8. p.2-18: this section discusses institution controls. The last sentence in the first paragraph states "[r]emedial alternatives are evaluated for soil that the potential to contaminate groundwater above mcls." What does this have to do with institutional controls? In the second paragraph in this section, it identifies long-term monitoring of groundwater conditions and allocation of an alternative water supply in the list of possible institutional controls. These two are not what we typically refer to as institutional controls. The groundwater monitoring may be necessary to determine whether institutional controls such as deed and access restrictions are still necessary. Provision of an alternative water supply may be part of a groundwater remedial action.

9. p.4-17: last paragraph evaluates whether alternative 1 (No Action) would comply with ARARs. ARARs are only triggered when a remedial action is taken. Therefore, an ARARs discussion is not necessary for a no action alternative. Please make this correction here and in other parts of the FS where ARARs is discussed for alternative 1.

10. p.4-31: last sentence, first paragraph - mentions RWQCB General Groundwater Cleanup Permit. Later on, the FS makes it clear that this is not an ARAR because on-site remedial actions do not require a permit and because it appears this General Permit applies to TPH discharges. Nevertheless, the DON feels that it will comply with the substantive requirements of this General Permit. Please make it clear that these will be TBCs, not ARARs.

11. p.4-37: first paragraph under "Overall Protection of HHE" - states that contaminated groundwater extracted from the aquifers is treated to meet prescribed discharge objectives and transferred to the Irvine Desalter Project for treatment. What are these "prescribed discharge objectives?"

12. p.4-49: first paragraph under "Compliance with ARARs" states that the time period required to meet the mcl for the shallow groundwater unit and principal aquifer is significant. Elsewhere in the FS (Table 6-1), I think we actually have a specific number of years. Why not say that here and in the other narrative parts of the FS?

13. p.4-57: last paragraph on this page - this section does not state that the cleanup of the principal aquifer will be accomplished through natural attenuation. I think it is important to state that under this alternative, it is projected that mcls for the principal aquifer will be met by natural attenuation.

14. p.4-63: section 4.5.2 states that alternative 1 will violate the RCRA groundwater protection ARARs. Please see

comment above regarding ARARs and no-action alternative.

15. p.A2-4: row which identifies ACLs as ARARs under CERCLA. The identification of ARARs is part of the procedure for Superfund compliance with requirements of other environmental and public health statutes when conducting remedial actions. The establishment of site-specific ACLs is provided for under RCRA (40 CFR 264.94), with CERCLA 121(d)(2)(B)(ii) providing a set of three additional conditions limiting the use of ACLs at Superfund sites where mcls would otherwise be applicable or relevant and appropriate. The 3 conditions identified here should just be listed as a footnote.

16. p.A2-7: second row - states that only the primary standards for vocs are State ARARs for this action. Are these State standards more stringent than the federal ones? Please make this clear.

17. p.A2-8: first paragraph under State and Regional Water Quality Control Board - since this only describes the Board's authority to establish water quality objectives, this should be deleted since this is not the ARAR. Alternatively, under the column comments, the sentence "[s]ubstantive provisions are ARARs" should be revised to read: "Substantive provisions which establish beneficial uses and water quality objectives for ground and surface waters are ARARs."

18. p.A2-10: please clarify what the following (in the last sentence of the second paragraph) means as applied to this site - "... located at the hydraulically downgradient unit of the waste management area that extends throughout the uppermost aquifer underlying the regulated unit...."

19. p.A2-17: first and second paragraphs refer to waste discharge requirements that implement the water quality plan. Since these waste discharge requirements are typically in permits, please clarify that the permits are not the ARAR but the substantive requirements in the permits. Also, delete reference to secondary mcls which are not ARARs as well as the substantive portions of the General Permit which are also not ARARs for reasons cited above. Both may be identified as TBCs if DON agrees they should be TBCs.

20. p.A4-1: delete A4.1.1, A4.1.2, A4.1.3 as ARARs are not triggered by a no action alternative.

21. p.A4-2: delete last row as record keeping requirements are not substantive requirements.

22. p.A4-8-10: delete these requirements that pertain to DOT requirements. These DOT requirements apply to offsite activities and are therefore not ARARs, although the facility has to comply with them in any transport of hazardous materials offsite.

23. p.A4-14: first row refers to waste discharge requirements. Again, make clear that the requirement is not the permit but the substantive requirements of such a permit. Also, on this page, delete reference to alternative 1.

24. p.A4-15: the row where Res. 92-49 is discussed - the last sentence two sentences should be deleted or rewritten. First, the last sentence should be deleted completely as this part of

the resolution does not establish any new requirement. In other words, whether the requirements of Chapter 15 and Res. 68-16 are ARARs depend not on this section of Res. 92-49 but on an independent analysis of Chapter 15 and 68-16, as applied to the site and remedial actions on that site. The second to the last sentence should be rewritten so that it quotes directly the language of Res. 92-49 III.G, which is the only substantive requirement of Res. 92-49 that may be an ARAR.