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MCAS EL TORO
SSIC #5090.3



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

September 27, 2001

BRAC Environmental Coordinator
Base Realignment and Closure, Environmental Division
Attn: Mr. Dean Gould
P.O. Box 51718
Irvine, CA 92619-1718

RE: Draft Technical Memorandum, Reevaluation of Risk, IRP Sites 8, 11, 12, Marine Corps
Air Station, El Toro, dated August, 2001

Dear Mr. Gould:

EPA has reviewed the above-referenced technical memorandum. In general, we understand the Navy's basis for conducting this reevaluation, however the results provided in this memorandum does not appear to significantly change the risks that were presented in the Proposed Plans and RODs. Our enclosed comments address our specific concerns.

If you have any questions, please call me at (415) 744-2366.

Sincerely, _

A handwritten signature in cursive script that reads "Nicole G. Moutoux".

Nicole G. Moutoux
Project Manager
Federal Facilities Cleanup Branch

Enclosures

cc: Michelle Sondrup, SWDIV
Triss Chesney, DTSC
Patricia Hannon, RWQCB
Greg Hurley, RAB Community Co-Chair
Marcia Rudolph, RAB Subcommittee Chair
Ms. Polan Modanlou, MCAS El Toro Local Redevelopment Authority

received
10/5/01

EPA Comments on Reevaluation of Risk for IRP Sites 8, 11, and 12

General Comment

While we understand the Navy revisiting their initial decisions due to changed in toxicity values, given that the majority of risks are due to PCBs, and risks did not significantly change at most sites, we find it difficult to support NFA using the justification in the tech memo, particularly when these risks and proposed actions have already been presented to the public.

Specific Comments

Site 8- Units 2 and 3

The Navy did not collect any additional data for these units and the risk did not change significantly using the new toxicity factors. Given that the HI remains above 1 and is primarily due to PCBs, which are persistent, and clearly a Navy source of contamination, EPA is not convinced that the rationale provided by the Navy for NFA is adequate.

Site 8 - Unit 5

The drawing provided in Appendix D is not very legible. The reader is unable to distinguish between PAHs and pesticides (as both are green on the legend). In addition, it is difficult to determine where the Phase II samples were taken. As the Phase II sample results are the basis for changing the decision to NFA, please provide a more legible map.

Site 11-Unit 1

As mentioned for Site 8, the Navy did not collect additional samples for this location, the risk did not significantly change, and the HI is still at 2.49 for the persistent contaminant PCBs. EPA does not believe that NFA is justified based solely on a change in toxicity values.

Site 11-Unit 2

Although the risk is quite low for this unit, the recalculated risk is not significantly lower and all the additional samples detected PCBs at some level. Given that the additional sampling confirmed the existence of PCBs, EPA again does not feel that NFA is justified.

Site 12 - Unit 3

Please note that on page 4-2, the newly calculated residential risk should be 2.1×10^{-5} instead of 1.1×10^{-5} .

As above, the risks for this unit decreased only slightly from the original risk and the HI remains over 3. The additional samples appear to have only be analyzed for pesticides and herbicides and therefore are not very useful in determining how much risk is attributable to arsenic, which the Navy maintains is responsible for driving the risk.