



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

July 24, 1997

Mr. Joseph Joyce  
BRAC Environmental Coordinator  
AC/S Environment (1AU)  
MCAS El Toro  
P. O. Box 95001  
Santa Ana, Ca 92709-5001

Re: EPA Comments on Draft Interim Record of Decision, Operable Unit 2A, Site 24-VOC  
Source Area Vadose Zone, MCAS El Toro, CA July, 1997

Dear Mr. Joyce:

The United States Environmental Protection Agency (EPA) has reviewed the above referenced document. Overall, it was technically accurate and well written. There are however some modifications and clarifications presented below that need to be addressed before the submittal of the draft final Record of Decision (ROD).

1. Pg. 1, Declaration - Description of Remedy : References to Site 25 should be deleted since the focus of the ROD is Site 24.
2. The signature page of the Declaration should be revised to remove EPA's Regional Administrator and insert Daniel D. Opalski, Chief, Federal Facilities Cleanup Branch as the signatory for EPA.
3. Pg. 5-2: Second to the last paragraph makes a statement that TCE usage ended in approximately 1975; p.5-9, second paragraph is a little less definitive. It states "assumed end of TCE usage." Please modify the language to be more consistent.
4. Pg. 5-5: Table 5.1 includes vehicle wash racks as potential surface sources of VOC contamination while table 5- 3 lists vehicle wash racks as subsurface sources.
5. Pg. 5-20: The last sentence in the first paragraph states that exposure to contamination in soils could occur through ingestion, inhalation or dermal contact, yet the first sentence of the second paragraph on pg. 9-1 states that soil contamination is too deep to present a direct risk to human health and the environment. This statements appear to be a contradiction and should be resolved.

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6. Pg. 6-1: The last sentence in the first paragraph states that no ecological risk assessment was performed because it does not provide a suitable habitat for any endangered species. Page 10-4 in Table 10-2 (Location Specific ARARs) lists the CA Endangered Species Act because of the American peregrine Falcon. This is another apparent contradiction that needs resolving.

7. Pg. 6-6: The third full paragraph discusses the risks for adults and children. Why is the risk from exposure to COPCs in ground and soil to children living in the homes less than the risk for adult occupants?

8. Pg. 6-10: The last sentence states that actual or threatened release from this site may present an imminent and substantial endangerment to public health. This statement seems to be over-broad since the risk from the site being addressed in this ROD is really only the risk from continuing contamination of the groundwater. I would suggest eliminating this language altogether.

9. Pg. 7-16, Periodic Reviews: Please reference the Table 4 Soil Gas Concentration Threshold Results in the text.

10. Pgs. 10-2 through 10-6: The ARARs tables should indicate whether a requirement is applicable or relevant and appropriate. The same holds true for the ARARs narrative discussion.

11. Pg. 10-2: the second row refers to Vadose zone protection standards. Isn't it more for protection of groundwater rather than Vadose zone?

12. Pg. 10-10: Before the Action-specific ARARs, there should be the CA Endangered Species Act which is in Table 10-2.

13. P. 10-11: Another reason why the public notification requirements are not ARARs is because these are not environmental standards or standards of control.

14. P.10-11: Since El Toro does not own any permitted unit within 100 meters of the proposed SVE location, Rule 1401 is not applicable. This section may want to make it clear that this requirement is not applicable but that El Toro thinks its relevant and appropriate and will therefore comply with the requirement.

If you have any questions, please do not hesitate to contact me at (415) 744-2210.

Sincerely,



Glenn R. Kistner  
Remedial Project Manager  
Federal Facilities Cleanup Branch

cc: Tayseer Mahmoud, DTSC  
Larry Vitale, RWQCB  
Andy Piszkin, SWDIV  
Bernie Lindsay, SWDIV  
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