



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

FILE/BINDER
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MCAS EL TORO
SSIC #5090.3

March 23, 1998

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 Final Phase II Groundwater Feasibility Report, Operable Unit (OU) 2A- Site 24, and On Navy Response To Agency Comments On The August, 1996 Draft Final OU-1 Interim- Action Feasibility Study (FS) Report, MCAS El Toro, CA

Dear Mr. Joyce:

The United States Environmental Protection Agency (EPA) has reviewed the documents referenced above. Based on our telephonic discussions on March 19, 1998, EPA hereby conditionally approves the above referenced documents providing the Navy revises said documents according to the agreements reached during the March 19, 1998 discussions.

These agreements are as follows: the Navy will revise the Groundwater Feasibility Study (FS) Report for Site 24 by deleting all references to Point of Compliance (POC) in the main text of the report and in the ARARs Tables, and from all maps. The Navy will insert new language into the FS stating that the Navy reserves its right to evaluate the applicability of POC to Site 24 in the future, after the groundwater and soil remedies have been installed and implemented for a period of time. Language from the groundwater Record of Decision for MCLB Barstow will be considered in the Navy's reservation of rights. The Navy will also include language in a Supplement to its response to EPA comments for the Site 24 Groundwater FS, that explains this agreement defer the application of POC.

Additional Comments

1) In response to Thelma Estrada's comment: where and how will soil gas concentrations be measured in the vadose zone for Site 24?; the Navy responded; "Soil gas samples will be collected from the effluent flow from the soil vapor extraction wells"... . Please be advised that EPA will require additional soil gas samples be collected from vapor monitoring wells apart from the extraction wells in order to better measure the effectiveness of the extraction system.

2) In response to EPA's Major Comment C.2 on the Draft final OU-1 Interim RI/FS Report, the Navy stated: "If a "stand-alone" alternative is selected, DON will consider installing and

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sampling one or more monitoring wells near Culver Drive"... prior to the approval of the Record of Decision. Please be reminded that EPA has not changed it's position that monitoring wells must be *installed prior* to any EPA concurrence on a "stand- alone" alternative. A *consideration* of installing wells is not acceptable to EPA.

Schedule Revision

Because of the additional time (approximately 60 days) needed to resolve EPA's concerns over Point of Compliance with the Navy, we acknowledge that a revised schedule pursuant to Section 9.2 (d) of the Federal Facilities Agreement is necessary. EPA will agree to the Navy submitting a revised schedule for OU-1 and OU2-A groundwater by April 2, 1998. I encourage you to contact the BCT members with your proposed schedule revisions prior to you submitting a formal revision.

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
Andy Piszkin, SWDIV
Patricia Hannon, RWQCB
Gregory Hurley, RAB Co-Chair