



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

*Incoming*  
M60050.002879  
MCAS EL TORO  
SSIC NO. 5090.3

April 18, 2000

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

RE: U. S. EPA COMMENTS ON DRAFT PHASE II FEASIBILITY STUDY, OU-3, SITE 16, CRASH  
CREW TRAINING PIT # 2, MARINE CORPS AIR STATION EL TORO, CA

Dear Mr. Gould:

The United States Environmental Protection Agency (EPA) has reviewed the above referenced document. Overall, the document is well written and the recommendation for a pilot or treatability study to obtain site specific design information is a sound proposal. EPA's comments are as follows:

1. p.2-8: Under Primary and Secondary MCLs: why is it necessary to state that the point of compliance for state mcls is the same as the federal mcls? In fact, why is it even necessary to bring up poc for this site and the proposed remedial actions?

2. p.2-9: Based on the current EPA Region 9 approach, the remedial alternatives utilizing thermal, catalytic oxidation would need to look at the requirements in RCRA Subpart O (incinerator regulations) as potential relevant and appropriate requirements. The discussion of off-site disposal, transfer and transportation of hazardous waste on this page (and subsequent pages and in the ARARs Tables as well) should make it clear that these are requirements that must be complied with but these are not ARARs. Also on this page, the substantive requirements for solid waste disposal facilities (Subtitle D) are identified as relevant and appropriate but it is not clear why. Aren't these requirements regarding prevention of contamination of underground drinking water sources, etc., already addressed by other ARARs such as State Water Board Resolutions or Subtitle C?

3. p.2-11: The table referenced in Section 2.1.6.1 should be 1-8 instead of 2-2.

4. p.2-14: Table 2-4 shows that there is a considerable TPH mass (618,000 lbs.) in the vadose zone. Will the TPHs be addressed? How? If they will not be addressed, the FS should state why not? Also, will the TPH's affect the efficiency of the proposed MPE system?

5. p.2-17: The first sentence on the top of this page cites the following as examples of engineering controls: removal, containment, or treatment. Yet, the section below, lists fencing, monitoring, signs, under engineering controls while containment and treatment are under not listed under engineering controls in the subsequent sections.

6. p.4-7: Under State Acceptance, add the word "yet" before commented.

7. p.4-9 and subsequent pages: As a general matter, EPA Region 9 believes RCRA Incineration Regulations (Subpart O) would be relevant and appropriate requirements for SVE with thermal or catalytic oxidation units.

8. p.4-22,23: First, the text states the extracted groundwater will not be treated; then, the text states that Alternative 2c could reduce concentrations of TCE below MCLs. How would this happen without treatment?

9. p.5-3: The first two criteria (overall protectiveness and compliance with ARARs) are really not used to compare the alternatives. They are threshold criteria and an alternative that does not pass these two will not even be considered for comparison with other alternatives. In the FS, this is probably fine but the ROD should not have these threshold criteria in this Table.

Comments on Appendix A, ARARs:

1. p.A1-3: Discharge to independent water purveyors is considered to be an off-site action. Does this include discharge to a POTW?

2. p.A1-5: As noted above, DOT and Dept of Commerce requirements are not ARARs in that these address requirements for shipping waste off-site.

3. p.A2-3: This Table lists Potential Federal Chemical-Specific ARARs only for the groundwater; yet on p.A2-12, that Table lists Potential State Chemical-Specific ARARs for groundwater, surface water, or soil.

4. p.A2-5: ACLs - the text states its not an ARAR, yet in the Comments column, it states that it's applicable to discharge of treated groundwater to surface water.

5. p.A2-20: As noted above, RCRA Subpart O, Incinerator Requirements, may be relevant and appropriate for SVE with thermal, catalytic oxidation units.

6. p.A2-21: The last paragraph under SDWA discusses point of compliance for Units 1 and 2. As noted above, why is this discussion necessary?

7. p.A2-22: First full par. states that wastes being addressed here are not hazardous. Isn't TCE a contaminant here?

8. p.A2-28: Under Title 27, the second sentence refers to Title 23. Do you mean Title 27? On the same page, under Title 23, The last two sentences seem contradictory.

9. p.A2-30: The last par. refers to Ill. F of Res. 92-49. EPA does not believe Ill. F contains any substantive requirements.

10. p.A2-34: Under RCRA Air Emission, see comment above regarding the relevance and appropriateness of Subpart O.

11. p.A4-1: First par. under Federal - the first two sentences should just read "Under CERCLA 121, cleanup standards for selecting a Superfund remedy, including the requirement to meet ARARs, are not triggered by monitoring only. Monitoring and reporting are not considered remedial actions."

12. p.A4-8, A4-9: See comment above regarding Subpart O.

13. p.A4-13: First row, under "Comments," the sentence here does not make sense.

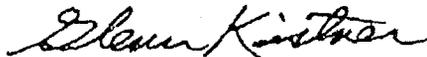
14. p.A4-24 and subsequent page: The discussion here states no permit would be required which is true but there is no acknowledgment that the substantive requirements would be complied with.

15. p. A4-30: The heading/Title "Criteria for Off-Site Disposal Rule, 40 CFR 300.440" should be moved to the next page (A4-31).

16. p.A5-2: The second paragraph states that although there are no discharges to groundwater associated with the remedial alternatives, RCRA groundwater protection standard requirements are relevant and appropriate. Why?

Please contact me if you have any questions.

Sincerely,



Glenn Kistner  
Remedial Project Manger  
Federal Facilities Cleanup Branch

cc: Triss Chesney, DTSC  
Patricia Hannon, RWQCB  
Gregory Hurley, RAB Co-Chair  
Polin Modanlou, EL Toro LRA