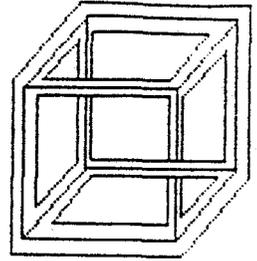


El Toro / OU2 Roster

Joe Barney	Jerry B. Werner	
Charles Bennett	John Westermeier	
Robert McVicker	Don Zweifel	
Fred Meier	Joseph Joyce	- ex officio
Maria Shayegan	Marcia Rudolph	- ex officio



Research • Service
M60050.003067
MCAS EL TORO
SSIC NO. 5090.3

7 October 1996

To: Marcia Rudolph

Project # - El Toro RAB -
Operable Unit Two (OU2)
Draft Feasibility Study Report

re: OU 2 Subcommittee member comments

Dear Marcia:

The attached comments are submitted to you as Community Co-Chair of the El Toro RAB as part of the OU 2 Subcommittee's comments on the Draft FS Report. These are submitted prior to the current deadline. A courtesy copy is being faxed to Joseph Joyce at the same time.

Yours sincerely,

Charles R. Bennett Ph. D.

BL Associates
224 W. Jacaranda Place
Fullerton, CA 92632
714-773-5525

August 15, 1996

Comments Regarding:

Draft Phase II Feasibility Study Report Operable Unit 2A - Site 24
Marine Corps Air Station, El Toro, California

A. Page v - Regarding the groundwater options, only "No Action" or "Extraction" are offered for thorough analysis. As no "*in situ*" treatment option was permitted to survive, no critical cost comparisons could be made among the three directions. Was "*in situ*" eliminated prematurely?

B. Page vii - The extraction volumes are quite significant for the shallow groundwater aquifer option, the cost of extraction is similarly quite significant - up to \$15,000,000. Is there no less costly alternative to "No Action" than "Extraction"?

C. Page 1-13 - Has the draft OU-1 IAFS been widely distributed? To whom?

D. Page 1-13 - The IAFS addendum is reported as "in preparation". As the selected alternative is probably to come from these added alternatives, has the information contained in this addendum been shared yet with the subcommittees, the RAB, and the community?

E. Page 1-18 - The site stratigraphy charts have many question marks, as do the TCE estimated boundaries. Uncertainty ranges should be narrowed. Could the analyses to determine stratigraphy be more definitive (e.g. TCE analysis only - "a rifle shot" approach) rather than so broad (i.e. "the shotgun" approach of analyzing for everything such as TDS, nitrate, pesticides, etc) ?

* F. Page 1-43 - Regarding 1,2-dichloroethane, the writer's explanation is not supported by the data (see attachment of memo to J. Joyce dated 28 Feb, 1996). Why has there been no response to the community regarding this point? Why was this error permitted to be reiterated unchallenged?

* G. Page 2-12 - The low MCL's and ARAR's, as presented in the table, are of concern if there is a potential presence of 1,1,2-TCA or 1,2-DCE. Are we certain there is no 112-TCA or 12-DCE present.

H. Page 2-19,20 - At this point the *in situ* treatments are highlighted. While some of these are described quite well in Appendix B, few of the agents mentioned on these pages are ever mentioned again (i.e. evaluated). Were the potential *in situ* methods evaluated thoroughly?

I. Table 2-8/ Page 2-45, 2-47, 2-49 - None of the *in situ* options were deemed "Applicable", only "Potentially Applicable" (N.B. "the devil is in the detail"); consequently, all detailed analyses (e.g. the costs) of these options are terminated. This is effective if your aim is either "No Action" or "Extraction". Has the community commented on the results of this screening method?

J. Table 2-8/ Page 2- 49 - "iron filings" ... "Difficult to implement due to the depth of groundwater at Site 24." (N.B. ~100 ft to groundwater, page BIII - 24). With this one comment, this option is sunk. Could the difficulty to implement this option cost >\$15,000,000 to overcome?

K. Page 3-2 - By this point, *in situ* methods are gone from feasibility consideration. *In situ* methods are typically 1/10 the cost of comparable *ex situ* treatments. Why has this approach been eliminated without careful, detailed review?