

**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	Greg Hurley	- ex officio



Research • Service

19 March 1997

To: Greg Hurley

Project # - El Toro RAB -  
VOC Source Area / OU 2A, Site 24 / Feasibility Study

re: Comment

Dear Greg:

The attached statement is submitted to you as Community Co-Chair of the El Toro RAB. I will be happy to comment further at the March RAB, should you so desire. The submission objective is to provide written documentation of my position. Copies are being sent to Joseph Joyce and Andy Piszkin.

Yours sincerely,

Charles R. Bennett Ph. D.

c: Joseph Joyce c/o Charly Wiemert  
Andy Piszkin

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March 19, 1997

Preliminary Questions  
regarding:

Draft Phase II Feasibility Study Report -  
OU 2A - Site 24 / March 1997  
Marine Corps Air Station, El Toro, California

**"Error is a hardy plant; it flourisheth in every soil."  
(Martin Tupper)**

For the Site 24 , Feasibility Study

A. Page ES-5, P 1, L 4: The "presumptive remedies" (from the USPA) are presented as prescriptive remedies for VOC-contaminated sites. Consequently, in order to bypass the identifying and screening of remedial technologies for Site 24, the VOC's should then be considered in total. Consequently, the bifurcation of remedial approaches for OU 1 and OU 2A would have to be rescinded, and a remedy that is comprehensive for both OU 1 and OU 2 must be presented.

Does this feasibility study, then, only address some of the VOC's of concern?

\* B. Page 1-42, P 2: The commentary regarding 1,2 DCA is flawed, this flaw has been acknowledged by staff personnel as early as February of 1996. Clarification and adequate explanation of these statements has NOT been provided to the RAB since that time. No known written substantiation for these flaws has been provided to the RAB. The persistence of the use of these data, which may be underestimating the potential toxicity of the groundwater, means that the risk assessment may be understating the true risk to human health and the environment.

Will this statement ever be corrected?