



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

M60050.003180
MCAS EL TORO
SSIC NO. 5090.3

June 17, 2003

Mr. F. Andrew Piszkin
BRAC Environmental Coordinator
Base Realignment and Closure
Marine Corps Air Station, El Toro
7040 Trabuco Road
Irvine, CA 92618

RE: Draft Screening Ecological Risk Assessment, Removal Site Evaluation, Anomaly Area 3,
Former Marine Corps Air Station, El Toro, dated May, 2003

Dear Mr. Piszkin:

EPA has reviewed the draft Screening Ecological Risk Assessment for Anomaly Area 3. As discussed at the meeting on June 10, 2003, the attached comments regarding this screening assessment are similar to those we have discussed for the Site 1 screening ecological assessment.

If you have questions, please call me at (415) 972-3012.

Sincerely,

A handwritten signature in cursive script that reads "Nicole Moutoux".

Nicole Moutoux
Project Manager
Federal Facilities Cleanup Branch

cc: Karnig Ohannessian, SWDIV
John Broderick, RWQCB
Rafat Abbasi, DTSC
Marcia Rudolph, RAB Subcommittee Chair
Robert Woodings, RAB Co-Chair
Judy Gibson, USF&W Service
Regina Donohoe, CA Dept of Fish and Game
Sonce DeVries, EPA

EPA Comments on Draft Screening Ecological Assessment
Removal Site Evaluation
Anomaly Area 3
May, 2003

General Comment

A single midwinter survey does not yield a conservative estimate of the actual biota on site, particularly with regard to special status plants which can only be identified through the flowers and biota nesting and feeding young. A spring and early summer survey would be much better particularly since some threatened and endangered species are listed as potentially or actually occurring on site.

Specific Comments

1. Page 3-5, Table 3-2: Wildlife Species Observed or Likely to Occur in the Area of AA3 - what is the meaning of the Status (3,4) column?
2. Page 3-6, Section 3.1.3, Sensitive Resources: The Navy describes the occurrence of mulefat scrub and coastal sage scrub in and adjacent to the site. Both are of special significance since they support threatened and endangered species. While it is understood there is very little of this habitat actually on site, the fact that it does exist there and close by means that it may be attracting and supporting these sensitive species. That means those species are more likely to be breeding and feeding on the site and must be addressed on an individual basis during the SERA. It should not be considered of "limited significance".
3. Page 3-7, Section 3.1.3, Potential Wetlands and Waters of the United States: With regard to the wetland, its jurisdictional status has nothing to do with ecological significance.
4. Page 3-7, Section 3.1.2, Wildlife: Please clarify whether the sensitive species occur on site or not according to the survey. Each is listed on Table 3-2 as if they were observed on site.
5. Page 3-7, Section 3.2, Identification of Chemicals of Potential Ecological Concern: Given there is no way to know exactly what may have been disposed of at this site, please justify why pesticides and herbicides were not included in the screening.
6. Page 3-8, Table 3-3, Maximum COPEC Concentrations Detected in Surface Soil: Please explain the meaning of the distinction between dioxins (bird) and dioxins (mammal).
7. Page 3-9, Section 3.3, Assessment Endpoints: The calculation of food-chain based ecological soil benchmark concentrations should be reserved for the BERA when everyone has agreed on the need for these calculations and has discussed the specific inputs. It is customary in the SERA to perform the screening by simply comparing the soil concentration of the contaminant to the Navy/BTAG TRV unless actual on-site data exists for computing BCFs.

8. Page 3-11, Section 3.4, Selection of Representative Species: The selection of representative species is probably premature at this point. As noted above, one mid-winter survey does not provide a conservative estimate of on-site species. In addition, the discussion concerning the use of raptors seems to miss the point of screening. The use of the raptor does not "defeat the purpose of screening" as stated in the text. If the raptor is screened against the site and no risk is detected, then we may be confident there is no risk.
9. Page 3-12, Table 3-5, Selected Representative Terrestrial Species for the SERA: The two selected species are acceptable but the list is incomplete. The sensitive species listed for the site must also be assessed and given the lack of a comprehensive species survey on site (as discussed above), this list could be incomplete.
10. Page 3-13, Section 3.5, Exposure Pathway Analysis: Considering there is wetland identified on site, it seems sediment should be included as a pathway. If there are sensitive species on site which would congregate in the wetlands, this would be a pathway of concern.
11. Page 3-13, Section 3.5.1, Species-Specific Exposure Factors: It would be helpful if the Navy would include a discussion of the results of preliminary screening of the contaminants versus the low BTAG TRVs and the ORNL benchmarks before refining the exposure factors. That would provide a clear picture of what the results are prior to beginning the BERA.
12. Page 3-14, 3-15, Section 3.5.2, Chemical-Specific Exposure Factors: Since we have no site-specific data on BCFs, the results of these calculations are very uncertain at best. What were the results of the screening?
13. Page 3-15, Section 3.6, Development of Conceptual Site Model: Since no cognizance has been taken of the wetlands on the site, this model is incomplete.
14. Page 3-19, Section 3.6.5, Allometric Conversions of TRVs: The Region 9 BTAG recommends against using allometric conversions in screening.
15. Page 4-1, Section 4.2.1, Hazard Quotients: Hazard quotients should be calculated and presented using the maximum soil/sediment concentration and the ORNL benchmarks or BTAG low TRVs, as appropriate before presenting the "adjusted" values.
16. Page 5-1, Table 5-1, Retained COPECs List for Tier 2, Step 3A BERA: This list is premature as discussed above. A more comprehensive biotic survey of the site and sediment and surface water samples should be provided, the list of receptors must be expanded to include sensitive species, and the list of COPECs should include pesticides and herbicides.
17. Appendix D-2, Working Draft Tier 2, Step 3A of the BERA Process: As noted above, these conclusions have been reached based on insufficient evidence.