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MCAS EL TORO
SSIC NO. 5090.3.A

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

February 7, 2001

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

RE: Draft Work Plan, Removal Site Evaluation, Anomaly Area 3, Marine Corps Air Station, El Toro, dated January, 2002

Dear Mr. Gould:

EPA has reviewed the above-reference workplan for Anomaly Area 3. Our comments are enclosed and are primarily with regard to groundwater characterization.

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

Sincerely,

Nicole G. Moutoux
Project Manager
Federal Facilities Cleanup Branch

Enclosures
cc: Kyle Olwenik, SWDIV
Triss Chesney, DTSC
Patricia Hannon, RWQCB
Marcia Rudolph, RAB Subcommittee Chair
Ms.Polan Modanlou, MCAS EL Toro Local Redevelopment Authority

received
2/26/02

Comments on RSE Work Plan for Anomaly Area 3
February, 2002

General Comment

It is not clear based on the figures provided that the proposed monitoring wells will adequately characterize the groundwater or the hydrogeology beneath Anomaly Area 3. This is particularly important since the waste encounters groundwater and the Navy states that "the potential release of contaminants from the waste to the groundwater will be evaluated using the groundwater monitoring well network".

1. P. 4-10, Bullet number 5 under threshhold levels: Please note that the new CA DHS action level for perchlorate is 4ug/l.

2. Figure 4-3, Proposed Sampling Locations: Please provide information on which monitoring well will represent upgradient conditions.

3. Figure 4-3, Proposed Sampling Locations: The Navy should consider adding monitoring wells on the northeast perimeter of the anomaly area as well as on the northern side of the anomaly area.

4. Figure 4-3, Proposed Sampling Locations: Please note on the legend as well as in the text on page 4-16 which samples represent sediment samples.