



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

March 28, 2001

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

RE: Response to EPA's comments on the draft Work Plan for Phase II Remedial Investigation for IRP Site 1 and Comments on the Draft Final Work Plan for IRP Site 1, MCAS El Toro

Dear Mr. Gould:

The Navy's response to EPA's comments were sufficient with the exception of comment number 22. EPA continues to have reservations regarding the adequacy of the upgradient and downgradient wells. We realize that these wells were installed during earlier investigations and as such they may not be adequate for this investigation. At a minimum, we request that before proceeding to Tier 3, the Navy submit a workplan to the BCT that outlines the number, locations, and purpose of the proposed groundwater monitoring well.

We provide the following additional comments on the draft final Work Plan:

1. p. 3-17, Section 3.3.5, Decision Rules: Under rule 10 B, the Navy states that risk management decisions will be made if risks fall between 10-4 and 10-6. Please state that these decisions could include response actions if necessary.
2. p. 3-21, Figure 3-4, Legend: Please provide the depths for the previous soil sample locations.

If you have any questions, please call me at (415) 744-2366.

Sincerely,

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

Nicole Moutoux
Remedial Project Manager
Federal Facilities Cleanup Branch

received
3 Apr 01

cc: John Broderick, RWQCB
Triss Chesney, DTSC
Greg Hurley, RAB Co-Chair
Content Arnold, SWDIV
Ms. Judy Gibson, US Fish and Wildlife Service
Ms. Polin Modanlou, MCAS El Toro Redevelopment Authority