



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
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January 28, 2003

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

RE: EPA comments on the Draft Record of Decision for Operable Unit 3, Site 16, Crash Crew Training Pit No. 2, Marine Corps Air Station, El Toro, CA, dated November 2002

Dear Mr. Piszkin,

EPA has reviewed the draft Record of Decision (ROD) for Site 16 at Marine Corps Air Station El Toro. The selected remedy calls for Monitored Natural Attenuation for the groundwater along with Institutional Controls and Vadose Zone Monitoring. In general we find this to be a very well written ROD and as such, we have only a few comments. The ROD has been reviewed by the EPA Project Manager as well as attorney, toxicologist and hydrogeologist. The following comments include their input:

General Comment:

Since the LUCICP is an integral part of the remedy, please reference it in the Declaration as well as section 10, Selected Remedy.

Specific Comments:

1. Pg. 2, Description of Selected Remedy: In the second to last paragraph it is stated that groundwater monitoring remediation will be considered complete when concentrations reach MCLs for 1 year. EPA guidance states that concentrations must be at MCLs for 2-3 years. Please revise.
2. Pg.2, Description of Selected Remedy: In the last paragraph the Navy states that EPA requires a contingency remedy when MNA is selected. EPA requires a contingency remedy not only for MNA but when predictive modelling is used heavily in remedy selection as is the case for Site 16.

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3. Pg 3, Statutory Determinations: In the third paragraph, the Navy states that if remedial objectives are not being met, they will evaluate potential new technologies or implement the contingency remedy. EPA believes that the point of the contingency remedy is that if objectives are not being met, the Navy should move directly to that remedy. Other technologies can then be evaluated while the contingency remedy is already in operation.
4. Pg. 4, Statutory Determinations and pg 10-8, Contingency Remedy: The first bullet states that if VOC groundwater data shows that after 10 years VOCs have extended or will likely extend farther downgradient than 1300 feet from the main pit predicted by the groundwater model, this will trigger the need to evaluate implementation of the contingency remedy. This bullet implies that migration of the plume is acceptable. It seems that the last bullet covers the intent to review the model and groundwater trends and make decisions based on them which may include implementing the contingency remedy. Please remove the first bullet as it causes confusion.
5. Section 7, Summary of Site Risks: This section does not include an analysis of the vapor intrusion pathway. The vapor intrusion pathway is the means by which volatile chemicals in groundwater or soil may enter into buildings and affect indoor air quality. This pathway can be evaluated as part of the post ROD vadose zone monitoring.
6. Section 7, Summary of Site Risks: Please identify if 1,4-dioxane was analyzed for as part of the groundwater investigation.
7. Pg7-15, Basis for risk management decision, 2nd paragraph: The discussion of how EPA and DTSC define the risk management range is confusing. Instead of referencing comments on prior RODS, the Navy could state that EPA and DTSC have made those comments on past documents.
8. Pg 8-3, Section 8.2.2, Alternative 2: The first paragraph should include discussion of the contingency remedy.
9. Pg. 8-4, Section 8.2.2.2 Institutional Controls: Please add that extraction wells that may affect plume movement will also be prohibited
10. Pg. 8-7, Section 8.2.2.3, Groundwater Monitoring: As EPA has stated in meetings and in prior comments, the appropriate monitoring well network will be developed during remedial design, and it may consist of some of the existing wells and will likely consist of additional wells. Please add the following sentence to the first paragraph on this page. The remedial design will consist of a Long Term Monitoring Plan to implement the MNA remedy. In order to evaluate the MNA alternative in the FS, a conceptual design was developed.
11. Figure 8-1: Please change the title of this figure to *Conceptual Groundwater Monitoring Well Network*.
12. Pg. 10-3, Groundwater Monitoring: Since we do not know which wells will be used to monitor the plume, please remove the second sentence of this paragraph.

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

Sincerely,



Nicole Moutoux
Project Manager

cc: Triss Chesney, DTSC
John Broderick, RWQCB
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