



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

May 19, 2004

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

RE: EPA comments on Draft Final Sampling and Analysis Plan, Amendment No. 1, Phase II
Remedial Investigation IRP Site 1, Former Marine Corps Air Station El Toro, dated
March, 2004

Dear Mr. Piszkin:

EPA has reviewed the above-reference workplan which addresses sampling at the ephemeral pond at IRP site 1 to determine whether activities at the range may have adversely impacted the pond and therefore the Riverside fairy shrimp found in the pond. We have consulted with both US Fish and Wildlife Service as well as CA Fish and Game. Letters from the other two agencies should contain comments similar to the attached comments.

We look forward to discussing this at the May 26 meeting and hope that fieldwork may commence shortly thereafter. Please call me if you have questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nicole Moutoux".

Nicole Moutoux
Project Manager
Federal Facilities Cleanup Branch

cc: Regina Donohoe, CA Fish and Game
Judy Gibson, US Fish and Wildlife Service
Sonce DeVries, EPA
Tayseer Mahmoud, DTSC
Marcia Rudolph, RAB Subcommittee Chair
Bob Woodings, RAB Co-Chair

received
5/25/04

EPA Comments on Draft Final Sampling and Analysis Plan
IRP Site 1, EOD Pond
dated March, 2004

1. Section 3, Rationale for the Amendment, Page 3-2: It appears that use of reporting limits for organics is acceptable, however, the Navy should provide a table which shows that the reporting limits are comparable to sediment toxicity benchmarks for benthic invertebrates (Talmage et al., 1999, MacDonald et al, 2000, Lotufo et al. 2001).
2. Section 4.2, Decision Statement, Page 4-1: Use of background as screening numbers for metals is acceptable only if background values do not exceed literature-derived toxicity reference values (ie, MacDonald, et al, 2000). It appears that most background numbers would be protective, with the possible exception of Mercury and Cadmium. As recommended in comment number 1, please provide a table which makes the comparison of background values to the appropriate sediment invertebrate toxicity benchmarks.
3. Section 4.5, Decision Rule, Page 4-2 : Use of mean concentration is not an acceptable way to screen for potential risk. Maximum concentrations should be used.
4. Section 4.5, Decision Rule, Page 4-2: EPA has concerns about the bioassays proposed for toxicity testing should the samples collected exceed screening values. However, in the interest of moving forward and collecting information as soon as possible, EPA suggests finalizing the approach for toxicity testing after the chemistry has been collected and evaluated.
5. Sections 4.7 and 5, Study Design and Field Sampling Plan, Pages 4-7 and 5-1: Comparison of bioassay results from the pond to results from a reference site is discussed however, there is no further discussion of where the reference site would be located. Prior to finalization of toxicity testing design, this reference site should be chosen.
6. Section 4.7, Study Design, Page 4.7: Please provide justification for sampling at a depth of 5 feet as this may not be the appropriate depth to obtain ecologically relevant information. Consider instead sampling at a depth of 15-45 cm.