

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

16 July 2007

Mr. Richard Weissenborn
BRAC Environmental Coordinator
Base Realignment and Closure
7040 Trabuco Road
Irvine, California 92618

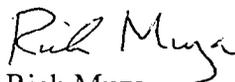
RE: Draft Work Plan, Groundwater Monitoring at Anomaly Area 3 and IRP Sites 1 and 2
Former Marine Corps Air Station (MCAS) El Toro, Irvine, California

Dear Mr. Weissenborn:

The EPA has completed its review of the subject document for the former MCAS El Toro. We provide two comments on this work plan that we would like to have addressed prior to initiation of this monitoring program.

If you should have any questions/issues with this review, please feel free to contact me at 415-972-3349.

Sincerely,



Rich Muza
Remedial Project Manager
Federal Facility and Site Cleanup Branch

cc Content Arnold, NFECSW SDIEGO
Louie Cardinale, NFECSW SDIEGO
Quang Than, DTSC
John Broderick, RWQCB
Bob Woodings, RAB Co-Chair
Marcia Rudolph, RAB Subcommittee Chair

7/24/07

**COMMENTS ON THE DRAFT WORK PLAN, GROUNDWATER MONITORING
AT ANOMALY AREA 3 AND IRP SITES 1 AND 2**

1. Table 5-1 & Appendix A, Sampling and Analysis Plan (SAP), Table 3-1 – Table 5-1 shows the “Spring Sampling Event” scheduled for July and the “Fall Sampling Round” scheduled for November. The information provided in Table 3-1 of the SAP indicates that since late 2001, almost all past ground-water sampling rounds at MCAS El Toro have occurred in March and September. Will the shift of the “spring” round to July potentially cause data comparability issues with data collected in recent years for these sites? Also, will the semi-annual rounds for all three sites proposed under this plan remain July and November until these projects move through the Superfund remedial process? It is recommended that further information be provided to support the rationale for the proposed sampling timeframes provided here in the work plan and in the SAP.

2. Appendix A, SAP, Section 5.1 & Table 5-1 – The on-going remedial actions at IRP Site 2 led to the destruction of a number of ground-water monitoring wells for the VOCs contamination present in the refuse/disposal areas down valley from the landfill. The Navy installed two replacement monitoring wells along the valley wall in the summer 2006 prior to the final grading and placement of rip-rap. Now that the remedial actions are reaching completion for the landfill at IRP Site 2, has the Navy considered the need to replace additional historic monitoring wells in this area and/or to augment the monitoring network based on the historical data? The proposed monitoring plan does not consider either of these possibilities for adding any monitoring well(s) to the existing network. It is recommended that this issue be addressed during the supplemental monitoring for the combined Site 1 and Site 2 FS.