



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

M60050_004067
MCAS EL TORO
SSIC NO. 5090.3.A

February 27, 1996

Joseph Joyce
BRAC Environmental Coordinator
Environment and Safety (Code 1AU)
MCAS El Toro
P.O. Box 95001
Santa Ana, CA 92709-5001

Dear Mr. Joyce:

EPA has reviewed the "Draft Final Addendum to the RCRA Facility Assessment" for MCAS El Toro, received on January 2, 1996. Please address the enclosed comments (Enclosure A) in the revised report. If you have any questions, I can be reached at 415/744-2368.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie Arthur", written over a horizontal line.

Bonnie Arthur
Remedial Project Manager
Federal Facilities Cleanup Office

Enclosure

cc: Mr. Tayseer Mahmoud, DTSC
Mr. Larry Vitale, RWQCB
Mr. Dante Tedaldi, Bechtel

ENCLOSURE A
EPA COMMENTS ON THE "DRAFT FINAL ADDENDUM TO THE RCRA FACILITY
ASSESSMENT, MCAS EL TORO"

Major

- 1) The BCT should discuss the most efficient means to incorporate these findings into the ongoing removal action and feasibility study process.
- 2) The tables used throughout this report are very useful data presentation tools. In future reports, please include the Phase I data on the figures.
- 3) Page 1-1, Section 1.1; Text is confusing. At NPL sites, such as El Toro, after sampling is completed as part of a RCRA assessment, these results are evaluated to determine if the areas assessed should be addressed via RCRA Corrective Action, CERCLA removal action or in the ongoing remedial investigation/feasibility studies.
- 4) Page 3-1; The Navy is currently recalculating soils background levels. Please revise the text.
- 5) Page 3-4, Section 3.1.4; It more clear to state that the PCB sample, Location 007H7, had a detection above 200 ug/kg, however, the exact concentration is not known. This location could potentially have concentrations above the industrial PRG also. EPA agrees that further confirmation of PCB concentrations or removal action is required at this location.
- 6) Page 3-7, 2nd paragraph; Please confirm whether thermal desorption is still proposed for use at MCAS El Toro.
- 7) Page 3-15, Section 3.5.4; The BCT should discuss the most efficient method to address the PCB levels at SWMU 88.
- 8) Page 3-21, Section 3.8.4; It does not appear correct to conclude that SVOCs were not detected below a depth of 10 feet. Section 3.8.2 states that samples were collected only to a depth of 8.5 feet bgs.