M60050.000601
MCAS EL TORO
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

21 April 1992

Andy Piszkin
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division
Code 1811
1220 Pacific Highway
San Diego, California 92132

Subject: EPA Review of MCAS El Toro Response to EPA Comments on the RCRA Facility Assessment Sampling Visit Work Plan

Dear Mr. Piszkin:

This letter transmits EPA's comments and review of the above referenced document.

If you have any questions regarding the attached comments or if you wish to discuss other matters related to the RI/FS, please contact me at (415) 744-2391.

Sincerely,

John Hamill

John Hamill
Remedial Project Manager
Federal Facility Enforcement Branch

Attachment

cc: Lt. Commander Serafini, USMCAS El Toro
Manny Alonzo, DHS
Ken Williams, RWQCB

GAVE TO CH2M-HILL
4/21/92

FINAL TECHNICAL REVIEW OF MCAS EL TORO
RESPONSE TO EPA COMMENTS
ON THE TECHNICAL REVIEW OF THE
RCRA FACILITY ASSESSMENT SAMPLING VISIT WORK PLAN
APRIL 1992

Item 1: Our concern about scoping, chemicals of concern, etc. continues, based on the line in the response "it was not possible to positively identify the wastes managed at some SWMUs (e.g., Hazardous Waste Storage Areas [HWSAs]) over the course of time." Therefore, the list primarily focused on "current wastes." How extensive has the scoping really been? Has an intensive effort been performed? Our related concern is that if sampling is only done at stains or cracks or where information indicated possible releases, then there may well be other locations where significant releases will not be detected because they won't be sampled. Ultimately, how sure can we be that these releases would likely be detected by the extensive groundwater monitoring network which will be installed under the RI/FS program?

Item 2: Response indicates there has been review of records as part of scoping effort. "Informal basis" for validation of old data may or may not lead to correct decisions, depending upon the amount and kind of data validated (the percent, which sites, which samples, etc.). Hasn't anyone applied criteria, such as the Functional Guidelines, to historical data? The last line indicates background soil samples will be collected in the RI/FS, which is appropriate. It appears that the "stratification" question was not answered in the response.

Item 3: Use of Level 4 rather than Level 3 may only increase analytical costs 20%, but data validation costs will be significantly higher for the complete data packages. Without a plan to look for more than the Contract Laboratory Program (CLP) parameters and a few tentatively identified compounds (TICs), chemicals of concern may be missed, which may be detectable by more specific, non-CLP methods. This gets back to the question of scoping and how complete the catalog of chemicals of concern is. While it was necessary to use the lists of chemicals from other sites (e.g., landfills) to select analytical parameters, this is not

sufficient. The types of materials specific to military bases need to be incorporated. That is to say that if contamination from a release is present, it may not be detected using these methods for only these parameters.

Item 4: Again, it comes down to the extent of scoping to determine whether testing at any particular site is warranted and the fallback hope that groundwater contamination will pick up whatever has come down from possibly untested sites.

Item 5: Acceptable.

Item 6: To put it another way, what is the size of a possible "hot spot" which might be missed by the sampling proposed? If samples are to be taken only from areas where staining or cracks are present, then releases which didn't stain or cause cracking might go undetected.

Item 7: Acceptable, however, the QAPjP should have a complete table with each method's precision, accuracy, and completeness goals listed, whether the methods are for Levels II, III, IV, or V.

Item 8: Still need to state how many field method blanks and frequencies of equipment rinsates are planned. Unless the field crew uses dedicated equipment (e.g., one set of boring equipment for one site only), they will need to clean the equipment and reuse it. In which case, an equipment rinsate is necessary to demonstrate it was properly cleaned and did not carry over any cross-contamination to the next sample.

Item 9: Perhaps no one has put PCBs into the waste oil from these operations, but this can't be certain without testing.

Item 10: Same as 9 above.

Item 11: Isn't 100% data validation required, not 10% or more "if problems are encountered?"

Item 12: Acceptable.

Item 13: We would recommend including some plans to audit the laboratories because the Navy audits are done annually at best, sometimes only once in three years or when problems are suspected. System audits would be a good idea, but at least plan on submitting some blind Performance Evaluation samples as part of a performance audit program.

Item 14: Acceptable.

The Department of Toxic Substance Controls (DTSC) comments on replacing Total Petroleum Hydrocarbons (TPH)/Total Fuel Hydrocarbons (TFH) with semivolatile organic compounds (SVOC) testing make sense to us, since more information can be obtained about specific compounds this way. However, given the costs associated with sample preparation and Gas Chromatography/Mass Spectrometry (GC/MS) analysis, there may be merit in using TPH/TFH for screening samples to be tested for SVOCs. Positive TPH/TFH at levels which could be detected by GC/MS could then be tested for individual compound's identities and quantities.