



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

M60050.000655
MCAS EL TORO
SSIC #5090.3

September 22, 2000

Base Realignment and Closure
Attn: Mr. Dean Gould
BRAC Environmental Coordinator
MCAS El Toro
P.O. Box 51718
Irvine, CA 92619-1718

Re: EPA COMMENTS ON GROUNDWATER MONITORING REPORT OCTOBER-
NOVEMBER 1998, ROUND 8 SAMPLING, AND GROUNDWATER MONITORING DATA
SUMMARY REPORT, 1999, MONITORING ROUNDS 9-11, FORMER MARINE CORPS
AIR STATION EL TORO, CA

Dear Mr. Gould:

The United States Environmental Protection Agency (EPA) has reviewed the above referenced reports dated May 24, 2000 and June 30, 2000, respectively. The reports summarize the results of sampling activities conducted by the Navy in 1998 and 1999. EPA conducted its' review of the reports in conjunction with the approved Draft Final CERCLA Groundwater Monitoring Plan (GMP) dated June, 1999.

As you may recall, the GMP was agreed to by all of the parties of the Base Closure Team (BCT) and is the template for the BCT in evaluating and documenting groundwater flow conditions and groundwater contamination at El Toro. Without this critical information, the BCT cannot properly evaluate the groundwater conditions or the groundwater monitoring program. Furthermore, page 1-2 of the GMP states: " Proposed modifications to the GMP will be submitted to the regulatory agencies for review and will only be implemented following regulatory agency approval".

The monitoring reports as submitted by the Navy do not include any data evaluation in the form of a trend analysis for contaminants of concern, nor do they include the appropriate water level data or data plots per the GMP. The lack of this critical information does not allow for any useful interpretation of groundwater conditions throughout much of El Toro.

As a result, EPA finds the reports to be unacceptable and requests that the reports be revised to include **all** of the elements and formats as agreed to in the approved GMP, unless the Navy receives regulatory agency approval to modify the reports.

The BCT expended considerable effort to develop a comprehensive monitoring plan (GMP) that would be a useful and essential tool in evaluating groundwater conditions at El Toro. Now it

seems that the GMP has either been ignored or forgotten. I hope that all future submittals will follow the agreed upon format and contain the information necessary to make a thorough evaluation of the data.

If you have any questions, please contact me at (415) 744-2210.

Sincerely,



Glenn Kistner
Remedial Project Manager
Federal Facilities Cleanup Branch

cc: Mr. John Broderick, RWQCB
Ms. Triss Chesney, DTSC
Mr. Gregory Hurley, RAB Co-Chair
Ms. Polin Modanlou, El Toro LRA

OPTIONAL FORM 99 (7-90)

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NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION