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ENVIRONMENTAL DIVISION
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MCAS EL TORO
SSIC # 5090.3

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Ser 1831.AP/ 794

September 7, 1994

Mr. John Hamill
U.S. Environmental Protection Agency
Region IX
Hazardous Waste Management Division, H-9-2
75 Hawthorne Street
San Francisco, CA 94105-3901

Re: FEASIBILITY STUDY (FS) FOR OPERABLE UNIT (OU) 1, MCAS EL TORO

Dear Mr. Hamill:

This letter addresses issues you raised in your April 14, 1994, letter on the El Toro team agreements for the OU-1 Feasibility Study. Our agreements were recorded during our February 9, 1994, Remedial Project Managers' meeting. This letter will only briefly address the following listed issues. Each concern has been discussed during past manager meetings and are addressed thoroughly in the draft Interim Action Feasibility Study (IAFS) dated September 1, 1994.

- 1. The definition of OU-1 and the scope of the IAFS.**
- 2. Treatment of extracted groundwater.**
- 3. The sufficiency of the Phase I Remedial Investigation data to support the interim action evaluated in the IAFS.**

The scope of the IAFS does not eliminate chemicals or constituents from OU-1. The IAFS focuses on the southwest quadrant and the trichloroethylene (TCE) contamination downgradient of the Station. This supports the definition of Site 18 as it is described in Attachment C, Statement of Facts, under the MCAS El Toro Federal Facility Agreement.

During the June 15, 1994, OU-1 meeting, all the agency members were provided a Preliminary Design Report (two volumes) on the Irvine Desalter Project prepared for Orange County Water District (OCWD) by Black & Veatch dated March 31, 1994. The report details treatment of extracted groundwater in the region. CERCLA requires that all remedial action alternatives seriously considered fulfill applicable or relevant and appropriate requirements (ARARs). Included in the draft OU-1 IAFS is an ARARs analysis for the regional groundwater contamination remedial alternatives.

On the issue of insufficient data, the Navy's position is that Phase I data combined with historical data obtained from OCWD are sufficient to support an interim action in the southwest portion of MCAS El Toro with the following remedial objectives:

1. Minimize further migration of groundwater containing volatile organic compounds (VOCs) that have emanated off station from sites at El Toro.
2. Reduce concentrations of VOCs in the main production aquifer.
3. Prevent human exposure to VOC contaminated groundwater above action levels.

The agencies have explicitly concurred with this position at meetings and by concurrence of written summary statements of the approach used for the OU-1 IAFS.

Your letter states in Specific Comment 2, "Until a minimum of four quarters [of groundwater sampling] have been evaluated, no conclusions can be drawn about the nature or extent of groundwater contamination at the Base." The Navy contends that this statement is overly broad and the conclusions that can be drawn from the available data are sufficient to support the scope of the OU-1 IAFS.

Specifically, it is clear that the source of the regional VOC plume is within the southwest quadrant of the Station. The approximate extent of the plume has been defined to a reasonable degree with the current groundwater monitoring wells. Further testing may result in changes in concentrations of the VOCs, but significant changes in the extent of VOC groundwater contamination and delineation of suspected source areas are not anticipated to change in the near term. Remember, the Navy has continued to perform monthly water level monitoring, and that additional rounds of groundwater sampling will be performed under a separate Groundwater Monitoring Program Plan currently in draft.

In conclusion, the Navy has addressed your concerns at our manager meetings and in our submittals. Much agency input has gone into the groundwater monitoring program plan dated July 21, 1994, and the recently submitted draft OU-1 IAFS of September 1, 1994.

If you have any questions about this letter, please contact me at (619) 532-2635.

Sincerely,



F. ANDREW PISZKIN. P.E.
Remedial Project Manager
By direction of
the Commanding Officer

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