



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

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MCAS EL TORO
SSIC # 5090.3

14 April 1994

Andy Piszkin
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division
Code 1811
1220 Pacific Highway
San Diego, California 92132-5181

Subject: Feasibility Study for Operable Unit 1
for MCAS El Toro

Dear Mr. Piszkin:

Enclosed are EPA's comments on the letter you sent me on 10 March 1994 on the agreements the El Toro team has reached for the Feasibility Study for OU 1. While I believe we have reached a basic understanding on what the objectives for the interim ROD for OU 1 will be, several points should be clarified for the record. If you agree with our comments, I think it would be appropriate to reissue the points of agreement to the El Toro team. It is critical that we all have the same understanding of not only the objectives and limitations of the interim ROD for OU 1, but also on the requirements for the final ROD for OU 1.

If you have any questions regarding this subject or if you wish to discuss other matters related to the RI/FS, please contact me at (415) 744-2385.

Sincerely,

John Hamill
Remedial Project Manager

Enclosure

cc: Commanding General, USMCAS El Toro
Bret Raines, Navy
Joe Zarnoch, DTSC
John Broderick, RWQCB
John Dolewowski, CH2MHILL

Draft EPA Technical Comments on MCAS El Toro's Letter on OU-1 FS Agreements

EPA has reviewed MCAS El Toro's letter dated 10 March 1994 from Mr. Piszkin (Navy) to Mr. Hamill (EPA) on the OU-1 FS, and finds that while we generally concur with the stated points of agreement, the letter needs some clarification. EPA's general and specific comments follow.

General Comments

1. OU-1 encompasses any contamination in the groundwater resulting from MCAS El Toro operations. This fact is not clear in the letter. A minimum of four quarters of data are required before any steps can be taken to eliminate chemicals or constituents from OU-1. It is crucial that MCAS El Toro conduct these additional rounds of groundwater samples so that a Final FS and ROD can be issued for this OU.
2. The Final FS should address a wide range of potential contamination. The Interim FS should examine whether or not the Orange County Desalter project will remove metals and semi-volatile organics as well as VOCs. Once the Desalter starts operation, it must be prepared to remove any other contaminants that appear in the groundwater.
3. It must be clearly stated in the Interim FS and Interim ROD that they have been prepared to address a specific, limited portion of the potential groundwater contamination at the site. They must also state that additional contamination is being investigated, how it is being investigated, and that any additional contamination will be addressed in a Final FS and Final ROD.

Specific Comments

1. Statement #1: Concur.
2. Statement #2: The data presented to the EPA thus far is insufficient to support this statement. The EPA has only received maps based on two quarters of groundwater sampling data. Until a minimum of four quarters have been evaluated, no conclusions can be drawn about the nature or extent of groundwater contamination at the Base. This has always been a basic requirement of the California Regional Water Quality Board, and the EPA will continue to support the Board in this.

It should also be noted that contaminants have been detected down gradient of CAOCs 2, 4, 5, 19, & 20, in addition to the CAOCs listed in this statement. Insufficient evidence exists to conclude that these areas of contamination are not connected to the plume emanating from the southwest quadrant of the base. This lack of data is both temporal (e.g., only two quarters of data have been presented) and spatially (e.g., there are areas that do not have adequate well coverage).

3 Statement #3: This is not adequate. See General Comment # 1 and #3, and Specific Comment #2. The Final FS report should address all contaminants in the groundwater. However, if the Interim FS will only address a part of the contamination that is present in OU-1, those limits must be clearly stated, and it must be clear that the Final FS will address all contamination.

4. Statement #4: This statement should include all contaminants, not just VOCs. Hydraulic containment and reduction of concentrations should be investigated for all contaminants in the groundwater. However, for the Interim FS, it may be sufficient to discuss the effect that the Orange County Desalter project will have on the various contaminants in the groundwater, providing that the limits are clearly stated. See General Comment #3.

5. Statement #5: This statement implies (and, in previous discussions, the Orange County Water District has repeatedly assured EPA) that the Desalter Removal Action will remove all contaminants, not only VOCs, thereby reducing the threat to public health and the environment to acceptable levels for all contaminants. This point needs to be clearly stated in the Interim FS and expanded on. For example, what is Orange County committed to treat? What processes will be used? What is the treatment capacity? What mechanism will be used to monitor the plant? In Short, EPA must be assured that the agreements reached at El Toro RPM Meetings will be met.

6. Statement #6: Concur.

7. Statement #7: Concur.