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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, CA 94105

M60050.000943
MCAS EL TORO
SSIC # 5090.3

1995 JUN 29 PM 2:13

June 26, 1995

Mr. 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 "Final Groundwater Monitoring Plan (GWMP)," received on April 4, 1995. Please address the enclosed comments (Enclosures A and B) in either a revised report or an addendum. 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".

Bonnie Arthur
Remedial Project Manager
Federal Facilities Cleanup Office

cc: Mr. Juan Jimenez, DTSC
Mr. Larry Vitale, RWQCB
Mr. Jason Ashman, SW DIV
Mr. Dante Tedaldi, Bechtel

ENCLOSURE A

EPA COMMENTS ON THE
"FINAL GROUNDWATER MONITORING PLAN (GWMP)"

- 1) If an alternative contractor is chosen to conduct the groundwater monitoring, the new contractor must complete the following:
 - o letter indicating willingness to utilize the CLEAN II Final Quality Assurance Project Plan (currently under revision) or a new QAPP for GWMP;
 - o Field Sampling Plan specific to the GWMP;
- 2) Please include the enforceable date, 2/20/97, for the draft Longterm Groundwater Monitoring Workplan, which the Navy and regulatory agencies negotiated as part of the revised FFA schedules in March 1995 (pages ES-1, 5-1).
- 3) Table 2-5;
 - A) The column entitled, "Position Relative to VOC Contamination," does not seem relevant given that VOC levels throughout the MCAS El Toro are identified in this table. Additionally, it is premature to focus only on the "Main VOC Plume," "Secondary VOC Plume," and the "VOC Contamination Near Site 3/4."
 - B) Please add a footnote to the appropriate "X" for monitoring wells if the concentrations are less than the Contract-Required Quantitation Limit (CRQL).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

June 16, 1995

MEMORANDUM

SUBJECT: Comments to the Final Ground Water Monitoring Plan, MCAS El Toro, CA
April 25, 1995

FROM: Herbert Levine, Hydrogeologist, Technical Support Section, H-9-3

A handwritten signature in black ink, appearing to read "Herb Levine".

TO: Bonnie Arthur, Project Manager, Navy Section, H-9-2

General Comments

One of the general comments provided by Rich Freitas to you on the Draft document was not addressed in the Final version. The comment requested a FSP specific to this task be prepared. It is critical that the Navy prepare a FSP that contains all relevant SOPs for this task. At present there is not a cohesive FSP that a contractor can implement. I recommend that one be prepared as an addendum to the GMP. It should be written so that any contractor in the future might be able to implement it.

I strongly recommend that the format used for the first two rounds of monitoring be used for all subsequent rounds. This format allows for rapid evaluation of within well trends which is extremely useful.

Specific Comments

1. Section 3.2.6 Metals, page 3-7, last paragraph. The FSP should address how the unfiltered samples will be collected. EPA recommends using a low-flow technique. In addition the GMP is silent as to how these data will be evaluated and what corrective action, if necessary, will be taken.
2. Section 3.2.7 General Chemistry Parameters, page 3-8. Please add turbidity to the list presented here.
3. Section 4.1 Field Procedures, page 4-1. Please add a description of the study mentioned here.

4. Section 5.1 Quarterly Monitoring Reports, page 5-1. The information presented here is acceptable, but is also vague. EPA expects the Navy to continue to employ the formats for reporting data as presented in the rounds one and two Groundwater Quality Data Report. In addition to the proposed contaminant distribution maps EPA recommends including cross-sections showing the vertical distribution of contaminants. The report for round three should include an evaluation of the nonfiltered vs filtered samples and an evaluation of the four inch pumps. The report issued for the fourth round should include an evaluation of the first four rounds and a recommendation to either continue the GMP or to amend it.

5. Section 7.0 Schedule, page 7-1. The Navy should provide a schedule which shows the anticipated start date, length of field activities, duration for analyses, delivery of report(s).