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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 9: 12
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

M60050.001059
MCAS EL TORO
SSIC # 5090.3

September 19, 1995

Joseph Joyce
BRAC Environmental Coordinator
Environment and Safety (Code 1AU)
MCAS El Toro
P.O. Box 95001
Santa Ana, CA 92709-5001

SEP 25 AM 9:12

Dear Mr. Joyce:

EPA reviewed the Final Phase II RI/FS Workplan (WP) and Field Sampling Plan (FSP), received on 8/15/95 and 8/28/95 respectively. Please address the following comments in either revised pages or by addendum.

- 1) As discussed at the 9/13/95 field meeting, EPA would like to have increased involvement with the air sparging and SVE pilot studies.
- 2) Page 4-2, 4-43; Replace RBCs with PRGs as used elsewhere in the revised workplan. Also, ensure proper usage of PRGs.
- 3) Page 4-5, Step 2, #10; EPA's comment regarding background levels refers to surface and sediment background levels, not soils.
- 4) Page 4-9; The use of the soils background levels should be revisited by the BCT. According to regulatory agency personnel, the calculated soils background levels (calculated from 11 samples) were intended for limited use.
- 5) Page 4-22; Please identify the table comparing PRGs and immunoassay detection limits as referenced on Page #4 of the Response to Comments. Table 4-4 gives detection limits not PRGs.
- 6) Page 4-33; Only the carcinogenic risk range is provided as the criteria for unacceptable preliminary human health risk. Add Hazard Index for noncarcinogens. Additionally, state when ecological risks would be calculated.
- 7) Site 3; The objective statement for Site 3 was not modified

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as stated in the response to comments.

- 8) Site 3; Which table states that dioxin analyses will be conducted?
- 9) Page H-15; Please correct typographical error. A "No Further Investigation" decision for Site 7, Unit 2, was not agreed to. This is stated correctly on Page H-33.
- 10) Pages O-i, Step 2 and W-39, Step 3; Change "No Further Response Action Planned (NFRAP)" to "No Further Investigation (NFI)." For example, see Site 12. EPA's legal staff is evaluating the use of NFRAPs at MCAS El Toro.
- 11) Page V-1; Please discuss why this site was changed from "Sewer Lines" to "Industrial Wastewater Sewer Lines." Also, as discussed in the Response to Comments, Page #14, sediment sampling may be necessary in areas such as Sites 10 where discharges are known to have occurred.
- 12) Please provide the schedule for the new EE/CAs.
- 13) Site 24; EPA concurs with your decision to proceed with limited surface sampling in the unpaved areas of the flightline. Please discuss the proposed analyses with the BCT at one of our weekly field meetings/conference calls.

If you have any questions, I can be reached at 415/744-2368.

Sincerely,



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