



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

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MCAS EL TORO  
SSIC # 5090.3

October 5, 1995

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 Risk Assessment Work Plan," received on September 11, 1995. Please address the following and enclosed comments (Enclosure A) in a revised report or addendum:

- 1) The "Response to Comments" states that many of EPA's comments on the Ecological Risk Assessment will be addressed in a Technical Memorandum. As this memorandum will address critical elements, such as the receptor and COPECs' lists, it is our preference to address these items in a Risk Assessment Work Plan Addendum. Please provide a schedule for submittal of this document in a separate letter.
- 2) Target cleanup levels can be discussed in the risk assessment, however, the remedial action objectives (RAOs) are developed as part of the Feasibility Study (FS). The BCT and the CLEAN II contractors should plan on scheduling scoping meetings prior to the preparation of the OU 2 and 3 FSs.

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

Mr. Joseph Joyce  
October 5, 1995  
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cc: Mr. Juan Jimenez, DTSC  
Mr. Larry Vitale, RWQCB  
Mr. Jason Ashman, SW DIV  
Mr. Dante Tedaldi, Bechtel



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901**

**MEMORANDUM**

**TO:** BONNIE ARTHUR  
REMEDIAL PROJECT MANAGER  
FEDERAL FACILITIES CLEANUP OFFICE

**FROM:** JEFFREY M. PAULL, MS HYG, MPH, CIH  
REGIONAL TOXICOLOGIST  
SUPERFUND TECHNICAL SUPPORT SECTION

**DATE:** SEPTEMBER 28, 1995

**SUBJECT:** REVIEW OF "FINAL RISK ASSESSMENT WORK PLAN, MARINE CORPS AIR STATION (MCAS) EL TORO, CALIFORNIA"

**Background**

A Risk Assessment Work Plan has been prepared by Bechtel National Inc. (BNI) on behalf of U.S. Department of the Navy, Southwest Division Naval Facilities Engineering Command (SWDIV), under the Comprehensive Long-Term Environmental Action Navy (CLEAN) II Program. The document is dated August 29, 1995. The purpose of the work plan is to assure that sample collection and analyses performed during the Phase II RI/FS for MCAS El Toro will adequately assess risks to human health and the environment.

**Scope of Review**

We reviewed Section 4 of the Final Risk Assessment Work Plan, pertaining to Human Health Risk Assessment. The document was reviewed for scientific and technical accuracy, and for conformance with USEPA Region IX risk assessment guidelines, policies, and procedures.

We assume that sampling of environmental media, analytical chemistry procedures or data, QA/QC procedures, and the assessment of contamination described and summarized in the document, have been adequately reviewed by appropriate USEPA Region IX and Cal/EPA staff. Minor editorial and grammatical errors that do not affect the interpretation of the risk assessment are also not addressed. We request that future changes in the document made in response to these comments be clearly identified.

**General Comments**

The information contained in Section 4 of the Risk Assessment Work Plan pertaining to the procedures to be utilized for performing the human health risk assessment in the RI/FS is comprehensive, logically structured, well-organized, and professionally presented. The work plan is generally consistent with USEPA Region IX risk assessment guidelines, policies, and procedures for conducting human health risk assessments, as presented in the USEPA Risk Assessment Guidance (RAGS), Exposure Factors Handbook, Preliminary Remediation Goals (PRGs), and other relevant documents. No significant deficiencies in the proposed work plan were noted, other than one inconsistency in the procedure for quantifying cancer risk, presented in our specific comment below.

**Specific Comments**

**Quantification of Cancer Risk, §4.3.4.1, p. 4-21:** It is stated in this section of the document, that in the risk assessment two sets of cancer risk estimates will be developed--one using USEPA CPF's exclusively, and a second set using available Cal/EPA CPFs, and defaulting to USEPA CPFs when Cal/EPA CPFs are not available.

This statement contradicts the statements made in the "Response To Comments Document prepared in Conjunction with the Final Risk Assessment Work Plan" regarding the procedure to be used for quantifying cancer risk. On page 1 of the "Response to Comments" in response to a comment by V. Garelick and C. Leadon, it is stated that "The Navy no longer requires dual tracking, and the plan has been modified accordingly." On page 6, in response to a comment by J. Paull, it is stated that "A [single] list of cancer risk estimates based on U.S.EPA cancer potency factors supplemented by Cal/EPA cancer potency factors for eight chemicals...will be used for the Phase II RI/FS baseline risk assessment" [emphasis added].

cc: Doug Steele, USEPA Region IX  
John Christopher, CAL-EPA/DTSC