



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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MCAS EL TORO
SSIC # 5090.3

15 September 1993

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

Subject: Comments on Responses to EPA Technical Review of
the MCAS El Toro Draft RCRA Facility Assessment

Dear Mr. Piszkin:

This letter transmits EPA's comments on the responses to
EPA's review of the MCAS El Toro Draft RFA.

If you have any questions regarding this subject or if you
wish to discuss other matters related to the RI/FS, please con-
tact me at (415) 744-2391.

Sincerely,

A handwritten signature in black ink that reads "John Hamill".

John Hamill
Remedial Project Manager

Attachment

cc: Lt. Commander Larry Serafini, USMCAS El Toro
Joe Zarnoch, DTSC
John Broderick, RWQCB
John Dalegowski, CH2MHILL

**Review of MCAS El Toro Responses to
EPA Technical Review of the MCAS El Toro Draft RFA
September 1993**

General Comments

We disagree with your response that the number of soil samples taken validates the RFA and that this refutes our concern that the effort was not comprehensive. Taking large numbers of soil samples is solely not a measure of a satisfactory investigation. Sampling may not have occurred in areas where historical information, readily available, indicates contamination may exist. Recent discoveries by representatives of the DTSC and MCAS El Toro of pertinent historical information found in the MCAS El Toro Environmental offices, and therefore readily available, continues to raise serious concerns to EPA that the effort was not comprehensive.

The objective of the RFA as quoted in the responses is incorrect and has been taken out of context. This point was made to the Navy and its contractor at the MCAS El Toro RPM meeting, May 26, 1993, at Riverside, CA. The objective of the RFA stated in EPA's comments was to make a comprehensive effort. The wording concerning identifying all potentially contaminated areas is consistent with EPA guidance¹ and was carefully chosen to express the agency's concerns. For example, the Conceptual Site Model is defined to be used "to identify all potential or suspected sources of contamination.....".

Furthermore, the responses ignore the second sentence in the EPA comment which was to provide additional clarification: "That is, given the inadequacy of previous site investigations, this RFA was to determine if and where releases of hazardous substances, pollutants, and/or contaminants had occurred." There is a distinct difference between coming across new information as an investigation continues and not making a comprehensive effort to obtain readily available information from the start.

¹ "Development of Risk-based Preliminary Remediation Goals"
U.S. EPA. OSWER Directive 9285.7-01B
Human Health Evaluation Manual, Part B, 1993

EPA acknowledges that the Draft PR/VSI Report was previously reviewed with comments submitted to the Navy on October 10, 1991. The rationale for providing these additional comments on the Draft PR/VSI was clearly stated.

Specific Comments

Comment No.

Responses

- | | |
|----|--|
| A1 | Response acceptable. |
| A2 | Which figures are being referenced? What is the numerical value of the "good correlation"? |
| A3 | El Toro feels that the identification of <u>abandoned</u> sanitary sewer lines as SWMU/AOC No. 12 is sufficient, since the facility's sanitary sewer system is too extensive to be seriously considered as a unit worth investigating as a source of potential releases. |

Although El Toro's sanitary sewer system is extensive, EPA believes that large portions of this network can be eliminated from being considered sources of releases based on the areas which these lines service. For instance, it is noted in Section 3.4 of the Draft PR/VSI report that El Toro's sanitary sewer system is divided into two separate gravity sewer systems, and that a portion of one of these systems collects sewage generated in the family housing area. Since no operational areas were serviced by this portion, EPA believes that this portion of the sanitary sewer system can be eliminated from further consideration. It is possible that this argument could apply to sewer lines carrying wastewater from barracks and administrative areas.

As far as operational areas are concerned, it is suggested that the first couple of hundred feet of sanitary lines be examined starting from where they originate at an operational area (for

example, oil/water separators), or in the vicinity of an operational area which has been known to manage wastes containing hazardous constituents. This approach should greatly reduce the sanitary sewer lines which need to be investigated.

- A4a No further response is necessary.
- A4b Response acceptable.
- A4c Response acceptable.
- A4d A value of 2 percent is not conservative, thus the statement "Because the ETM uses other conservative assumptions, it was not appropriate to change only this parameter in the model while leaving others as is." is incorrect.
- A4e Response acceptable.
- B1a This comment is based on waste management practices at the facility. El Toro asserted that EPA has been inconsistent when commenting on Section 1.4 of the Draft PR/VSI, since it previously (October 1991) indicated to El Toro that the discussion on waste management practices is "very good."
- EPA agrees that it is impossible to identify "all" past and present operations and "all" waste streams resulting from these operations. However, EPA did not intend to imply that for an RFA to be satisfactory, all operations and resulting waste streams need to be determined, or that all SWMUs/AOCs need to be identified for an RFA to be deemed complete. EPA does believe, however, that the facility must be able to demonstrate that the facility has made an effort to identify past and current SWMUs and AOCs at its site, to the extent practicable.

For example, the Draft PR/VSI report identifies a number of wastes in Table 1-1 (such as lab-packs, asbestos contaminated materials, etc.). However, the report does not even attempt to address the process/area which generated some of these wastes or the SWMUs which managed the wastes prior to shipment off-site. EPA has no way of knowing whether the facility even attempted to determine the source of some of these wastes, and the units where they were managed. In addition, note that Table 1-1 lists wastes shipped from El Toro in 1990, and the date of the Draft PR/VSI report is only July 3, 1991. It is these types of cases that led EPA to its conclusion.

- B1b Although MCAS El Toro states that review of records from additional agencies (such as TSCA, CARB or OSHA) is not likely to yield useful information, please note that EPA's RFA Guidance Document (1986) indicates that review of files from the majority of the suggested agencies could result in the identification of additional SWMUs/AOCs. EPA suggests that for the RFA to be deemed complete, information be obtained from the following agencies: TSCA offices, OSHA offices, SCAQMD, and CARB.
- B1c With respect to the storm drainage system, please refer to Comment A3 above.
- B1d1 Response acceptable.
- B1d2 Provide documentation for this statement.
- B1d3 EPA concurs with MCAS El Toro's assessment.
- B1d4 Response acceptable.
- B1d5 Response acceptable.

- B1e EPA's comments in this section were largely posed with the intent of determining the specific SWMU(s) at which waste management practices might have occurred. For those responses not found acceptable EPA requests that the following information be submitted as follows:
- B1e1 Response acceptable.
- B1e2 Response acceptable.
- B1e3 At what SWMU/AOC the fuel tank flushings collected (please indicate the SWMU/AOC No.).
- B1e4 Please identify the SWMU/AOC No. corresponding to the HWSA indicated as managing waste from the medical and dental facilities, as well as asbestos-containing waste, waste sulfuric acid, waste alkaline liquids, and lab packs.
- B1e5 MCAS El Toro states that batteries were drained at various locations, including the DRMO Storage Yards and HWSAs. Specify (if possible) the other SWMUs/AOCs (please specify the numbers), including the identity of the specific HWSAs, at which this operation may have occurred.
- B1e6 Response acceptable.
- B1e7 Response acceptable.
- B1e8 Response acceptable.
- B1e9 Response acceptable.
- B1e10 Response acceptable.

- B1e11 Was MCAS El Toro able to identify any of the SWMUs/AOCs at which sandblasting operations routinely occurred; and the SWMUs/AOCs where they might have been accumulated or stored?
- B2a EPA cannot find any such General Comment 12 in the October 10, 1991 reference cited. Please provide clarification.
- B2b What assurances can be given that the sampling and analyses effort would detect all chemicals contained in the wastes released at MCAS El Toro? The examples given are not the hazardous constituents present in the wastes managed by the SWMUs/AOCs.