

DRAFTM60050.001300
MCAS EL TORO
SSIC # 5090.3**EPA COMMENTS ON THE MCAS EL TORO FINAL WORK PLAN AND FIELD SAMPLING PLAN, PHASE II REMEDIAL INVESTIGATION/FEASIBILITY STUDY**

- 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 this page 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 agency personnel, the calculated soils background levels (calculated from 11 samples) were for specific purposes only.
- 5) Page 4-22; EPA could not find a table comparing PRGs and immunoassay detection limits as discussed in the response to comments on Page #4 of the Response to Comments. Table 4-4 gives detection limits not PRGs.
- 6) Page 4-33; Only carcinogenic risk range given for unacceptable preliminary human health risk value. 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 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.
- 8) 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 attorney is evaluating the use of NFRAPs for MCAS El Toro.
- 9) Page V-1; Please discuss why this site was changed from "Sewer Lines" to "Industrial Wastewater Sewer Lines." Also, necessary to discuss whether any investigation is warranted for the storm sewers.
- 10) Please provide the schedule for the new EE/CAs.
- 11) 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

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field weekly meetings/conference calls.

FIELD DECISIONS

- 1) Fate and transport models will be selected in consultation with regulatory agencies.
- 2) Site 2; "Trenching will be performed after the results of the surface geophysics and discussion with the BCT."
- 3) Site 5; "Initially existing Site 5 GW monitoring wells will be sampled and analyzed for COPCs and GW elevations. The data will be compiled and reviewed with the BCT and a determination will be made as to the final location of the proposed groundwater monitoring well."

ISSUES TO BE HANDLED ELSEWHERE (PLEASE CLARIFY/CONFIRM)

- 1) Site 15; Page O-9; EPA comment: The "mounded material" observed in the SAIC survey is stated to be outside of Site 15. Which site will it be handled within? Response to comment: This statement has been removed from the workplan as agreed to at the BCT Meeting on 6/2/95. Not clear from my notes how this is handled.
- 2) Site 15; EPA's comment: "During the 5/2/95 regulatory site visit, the covered soil piles were observed. Apparently these soil piles have been located at Site 15 for many years. These should be sampled and properly disposed of." Response to comments: This issue is being addressed as part of the EBS.
- 3) Site 16; EPA comment: The text indicates that the evaluation of the current Crash Crew Pits "will be included under the Base Closure Plan." Clarify which Navy RPM and contractor is responsible for this area. Navy response: This site will be addressed in the Base Closure Plan (BCP), responsibility for this site has not yet been delegated. The next BCP update will include provision for this site (BCT Meeting of 5/31/95). Who is responsible for indexing these?
- 4) Site 16; EPA comment: The text indicates that SWMU/AOCs 288, 289 and 290 will be evaluated under the MCAS El Toro USI investigation. Please clarify if a Navy RPM was contacted for this information. Response: The underground storage tanks (USTs) at MCAS El Toro including these SWMU/AOCs at Site 16, will be assessed and remediated under the UST program. Responsibility for this work has not yet been delegated.
- 5) Site 24; From the response to comments: "The OU-2 aquifer pumping test data will be used to support the OU-1 Interim-Action Feasibility Study." Coordination issue between CLEAN 1 and 2 contractors.