



DEPARTMENT OF THE NAVY
OFFICE OF THE GENERAL COUNSEL
COUNSEL FOR SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY RM 250
SAN DIEGO, CALIFORNIA 92132-5189

M60050.001985

5800
Ser 503.RC/5397
18 September, 1997

Thelma Estrada, Esq.
Mail Code RC-3-4
Office of Regional Counsel
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Frances McChesney, Esq.
Senior Staff Counsel
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Re: MARINE CORPS AIR STATION (MCAS) EL TORO INTERIM RECORD OF
DECISION (ROD), OPERABLE UNIT 2A, SITE 24 VOC SOURCE AREA

Dear Ms. Estrada and Ms. McChesney:

The following language was discussed in our conference call on Monday, September 15, 1997. It modifies the language included in Ms. McChesney's letter of September 10, 1997. This language would be inserted at the end of Section 10.2.1.1 of the draft final ROD:

"The Regional Water Quality Control Board alone does not agree that the method and criteria used for determining "threshold concentrations" for shutoff of the SVE system complies with State Water Resources Control Board Resolution No. 92-49 or with Title 23, California Code of Regulations, Section 2550.4 or Title 22, California Code of Regulations, Section 66264.94. It is the Board's position that the use of a 40-foot mixing zone and a point of compliance in the ground water and other assumptions used in setting "threshold concentrations" will not necessarily result in cleanup of the vadose zone to the extent technically and economically achievable and at least to a level that assures that contaminants will not discharge into ground water at levels greater than the aquifer cleanup levels for the underlying ground water. However, the Marine Corps has agreed to reevaluate the shutoff criteria for Site 24 in the final ROD for Site 24. Therefore, the Regional Water Quality Control Board will not dispute this Interim ROD."

In addition, we will make the following two related changes in the language:

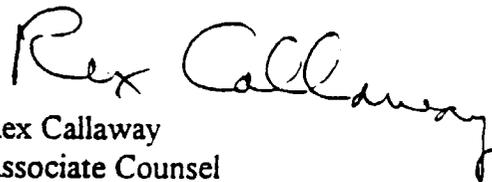
5800
Ser 503.RC/5397
18 September, 1997

Re: MARINE CORPS AIR STATION (MCAS) EL TORO INTERIM RECORD OF
DECISION (ROD), OPERABLE UNIT 2A, SITE 24 VOC SOURCE AREA

1. Revise the last sentence under the heading "State of California's Position Regarding SWRCB Resolution Nos. 68-16 and 92-49 in Section 10.2.1.1 to read: "However, the State does not intend to dispute the ROD. See below."
2. Delete the third sentence of the second paragraph under the heading "Relationship between Groundwater and Vadose Zone" in Section 10.2.1.1 and delete the point of compliance reference in Figure 5-1.

I appreciate your cooperation with our tight deadline. Please let me know if you have any further comments or questions.

Sincerely,



Rex Callaway
Associate Counsel
(Environmental)

Copy to:
Wayne Lee, COMCABWEST
Maj. Tim Evans, USMC WACO