

C76155/0017



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

75 Hawthorne Street
San Francisco, CA 94105

November 3, 1997

Mr. Joseph Joyce
BRAC Environmental Coordinator
AC/S Environment (1AU)
MCAS El Toro
P. O. Box 95001
Santa Ana, CA 92709-5001

Re: EPA Comments on Draft Proposed Plan for Closure of Inactive Landfills, Sites 2, 3, 5, and
17]

Dear Mr. Joyce:

The United States Environmental Protection Agency (EPA) has reviewed the above-referenced document and have the following comments:

General Comments:

While the Proposed Plan is generally well-written, easy to understand and contains sufficient information for meaningful public comment, there are some areas that could be clarified.

EPA generally agrees with the Navy's selection of Alternative 3 for the 4 landfill Sites, as long as the alternative is consistent with reuse. EPA also would support Alternative 4D for Site 5 if the reuse is a golf course (Alternative 4D would reduce water infiltration in conjunction with irrigation), and Alternatives 5 or 6 for Site 3 which would potentially expand reuse options. The additional costs associated with these alternatives are also not much more than the costs estimated for Alternative 3.

Specific Comments:

1. pg.1, first paragraph; We suggest adding language that explains the process in more detail such as; "A final remedy for the sites will be selected only after the public comment period has ended and all comments have been reviewed and considered. The final remedy will be documented in the Record of Decision (ROD)."

2. pg.1, 4th paragraph; Please add "approximately" before "30 years".

3. pg.1, "Opportunities for Community Involvement", 1st paragraph - last sentence; please add the word "formally" before "comments on the alternatives."
4. pg.1, "Opportunities for Public Comment", last paragraph - last sentence; please add "or in person at the Public Meeting mentioned above." to the end of the sentence.
5. pg. 2. Site 2; suggest changing "bisected" to "crossed".
6. pg.2, Site 2; The middle of the paragraph states that Site 2 is bisected by an unlined constructed drainage channel that is located between the two landfill areas. Which two landfill areas?
7. pg. 2, "Landfill Investigations" - 2nd paragraph; suggest replacing the word "conduit" with "means".
8. pg.3; Suggest removing "fate and transport" and use "modeling analysis" or just "analysis".
9. pg.3; 2nd paragraph; suggest replacing, " biodegradation" with "biological breakdown".
- 10) pg. 3, 2nd paragraph; suggest adding, "(where drinking water is taken)" after, "do not impact regional groundwater."
11. pg.3; The last sentence states that monitored Natural Attenuation (NA) is recognized by US EPA as a viable method for cleanup of groundwater. While this is true, it is misleading to include this with a "presumptive remedy". EPA does *not* consider NA to be a presumptive remedy. The Proposed Plan appears to be recommending 2 remedies: 1) capping as a presumptive remedy and, 2) NA. If this is so, then it should be clearly stated at the beginning of the document. After referencing NA, the phrase "it is expected to reduce contaminant levels in groundwater within a reasonable time frame." should be added.
12. pg.4; After the discussion of Site 17, recommend adding a sentence stating "Details of the removals conducted at Sites 2 and 17 are on page 8."
13. pg.4; In the middle of the first paragraph under "Human Health and Ecological Risk Assessments," the sentence starting with "[A]lthough the risk assessments are based on very conservative assumptions, only the soils surrounding" is a little hard to follow. In other words, what does the first part of the statement about risk assessments based on a very conservative assumption have to do with the second part of the sentence, i.e., that only the soils surrounding the buried wastes were sampled?
14. pg.4; The sentences beginning with "This approach is typical for landfills".... and "Sampling of landfill materials".... and " Drilling into the landfills" are repeated from page 2 and should

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be deleted to make the Risk Assessment section briefer.

15. pg 4; Please add the Regional Water Quality Control Board to the paragraph underlying "Identifying Exposure Pathways".

16. pg 5; Suggest deleting the first two sentences under the heading "Estimating Human Health and Ecological Risks" as they basically say the same thing as the sentences that follow.

17. pg.5; The paragraph under the same heading should be revised to state; "To manage risks and protect human health from known or suspected carcinogens, U. S. EPA has established acceptable *exposure levels* at general concentration levels that represent an *excess* upper bound lifetime cancer risk to an individual of between 10^{-4} (1 additional case in a population of 10,000) and 10^{-6} (1 additional case in a population of 1,000,000) using information between dose and response. Various site specific factors such as exposures, types of contaminants and potential future uses are factored into the selection of a remedy that protects human health."

18. pg.5; Suggest inserting icons in "Soil", "Groundwater", and "Ecological" headings.

19. pg.5; "Soil," Is "100,000,000" correct?

20. pg.5. Suggest inserting, (e.g., insects) between invertebrate and diet in last sentence.

21. pg.6; Please bold or italicize words describing the various remedies.

22. pg.6, 2nd paragraph; Please add (dilution, etc.) after monitored natural attenuation.

23. pg.6; Suggest using different coloring, fonts& hatching, etc., to Alternative 3 or any other alternative chosen, to distinguish between the alternatives.

24. pg.7; Suggest deleting the first full paragraph since it does not really add value to such a lengthy document.

25. pg.7; The illustration on this page should be titled or labeled.

26. pg.7; More should be done to highlight the preferred alternative.

27. pg.7; Suggest replacing 2:1 with some other description (e.g. double, twice as much,etc.).

28. pg.9; "Postclosure Maintenance" - first sentence: change "are begun" to will begin."

29. pg.10; Compliance with ARARs - states that the preferred alternative meets all ARARs. What about the other alternatives (excluding including Alternative 1 (no action)? Also on this page, under "Reduction of TMV," the statement "all alternatives are expected to achieve reduction in TMV" should be qualified by adding the phrase "except alternative 1."

30. pg.10; Add "Alternative 3" after "Evaluation of" in the heading.

31. pg.10; Suggest changing the font (Times Roman with italics?) of the paragraph under the page heading.

32. pg.11: Delete the first two rows from the Table entitled "Comparative Analysis of Alternatives" since these two are threshold criteria that must be met. In other words, an alternative that does not meet both criteria does not even get to this point of being compared to other alternatives.

33. pg.11; Add the number of the preferred alternative when discussing it.

34. pg.13; Suggest using a different font in color box to make type easier to read.

35. pg.14; ARARs:

First, the statement that remedial actions at sites listed on the NPL must meet ARARs is not completely accurate. All remedial actions necessary to carry out sections 104 (Response Authorities) and 106(Abatement Actions), regardless of whether the site is on the NPL, shall be carried out in accordance with section 121, including the requirement to comply with ARARs. Section 121 applies to federal facilities through section 120.

Second, the organization of the ARARs is very confusing. For instance, the State ARARs are listed under each State Agency. We suggest that the ARARs section be reorganized in the following manner: First, the ARARs should begin with the Federal ARARs, listing these according to location-specific, chemical specific and action-specific requirements. Then, this should be followed by a listing of State ARARs, again by location-specific, chemical-specific and action-specific requirements. This could be done through an ARARs Table, which should have the following: specific citation to the Federal or State law or regulation, description of the specific requirement that must be complied with, whether the requirement is applicable or relevant and appropriate, and the site to which the requirement applies. Please note that the state regulations for municipal solid waste landfills (which these sites appear to be) are now in Title 27 although there are still some requirements in Title 23 Chapter 15 that may be potential ARARs. The distinction between these two apparently is this: Title 27 contains all the permitting requirements for solid waste landfills while Title 23 Chapter 15 regulates remediation of waste management units (landfills) regardless of whether they are permitted or not. If the waste in these landfills are hazardous waste, the appropriate regulations are Title 22 (RCRA Subtitle C). In that instance, Title 27 and Title 23 (Chapter 15) should only be cited as ARARs if these contain more stringent requirements than Title 22.

36. pg.15; Last sentence in first paragraph refers to this as the IRP process. Isn't this more appropriately known as the CERCLA process?

37. pg.15; The information in the text concerning the various OUs is very "busy". Can the

information be portrayed in another manner such as using bullets or by categorizing the individual site OUs?

38. pg.16; Mr. Andrew Bain is in the Superfund Division not in the Office of Haz. Waste.

If you have any questions, please feel free to contact me at (415) 744-2210.

Sincerely,



Glenn R. Kistner
Remedial Project Manager
Federal Facilities Cleanup Branch

cc: Tayseer Mahmoud, DTSC
Larry Vitale, RWQCB
Andy Piszkin, SWDIV
Tim Latas, Bechtel