

**RESPONSE TO COMMENTS
 PLANNING DOCUMENTS FOR THE OU-3B PHASE II
 REMEDIAL INVESTIGATION/FEASIBILITY STUDY AT
 MCAS EL TORO, CALIFORNIA**

<p>Originator: Glenn R. Kistner, RPM US EPA</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: February 4, 1999</p>	<p>CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0178 File Code: 02221</p>
<p><u>COMMENTS</u></p> <p>1A. [FSP Site 7: Figure G3-2, Proposed Phase II RI Soil Sampling Locations; Table G5-1, Site 7 Units 1 and 3 Soil Sampling and Analysis; Section 5.1.2, Unit 3-New East Pavement Edge; WP Site 7: Figure G-2, Proposed Phase II RI Soil Sampling Locations; Table G-3, Site 7 Units 1 and 3 Soil Sampling and Analysis] Figure G3-2 and Section 5.1.2 of the FSP and Figure G-2 of the WP indicate that 56 samples from 14 locations will be collected at Unit 3. However Table G-3 of the WP and Table G5-1 of the FSP indicate 36 samples from nine locations will be collected. This inconsistency in the document should be resolved.</p>	<p><u>RESPONSES TO COMMENTS</u></p> <p>RESPONSE 1A: On December 22, 1998, replacement pages for pages G-25 and 26 (Addendum to Appendix G) and pages G5-1 and 5-2 (Addendum to Attachment G) were issued to the BCT. These pages resolved this inconsistency. They indicate that 56 soil samples would be collected from 14 locations at Unit 3 of Site 7.</p>
<p>1B. Figure G-2 of the WP and Figure G3-2 of the FSP should identify five locations for Unit 1 and 14 locations for Unit 3. It is recommended that these locations be labelled.</p>	<p>RESPONSE 1B: Figure G-2 of the Addendum to Appendix G and Figure G3-2 of the Addendum to Attachment G have been updated to include labeling of sampling locations.</p>
<p>2. [FSP Site 7: Section 5, Request for Analyses; QAPP: Section 6.3.1, Duplicates] Section 5 of the FSP states that Section 6 in the QAPP specifies the number and/or frequency for collection of field duplicate and blank samples during the Phase II field activities (BNI 1998b). Section 6.3.1 of the QAPP states that for soils at Site 7 Units 1 and 3, one duplicate sample will be collected per unit. The number of duplicate samples are not consistent with Region 9 guidance which recommends collecting duplicate samples at a frequency of at least ten percent of all field samples for all parameters and matrices. The documents indicate that 20 samples for Unit 1 and 56 samples for Unit 3 will be collected during Phase II study. The duplicate samples for Units 1 and 3 should be two and six respectively. It is also recommended that the FSP identify the location of duplicate sampling.</p>	<p>RESPONSE 2: Section 6.3.1 of the QAPP (page 6-2) and Table G5-1 of the Addendum to Attachment G have been revised to indicate that two duplicate soil samples will be collected from Unit 1 and six duplicate soil samples will be collected from Unit 3. In addition, Sections 4.2.1 and 4.2.2 of the Addendum to Attachment G have been revised to indicate: the duplicate soil samples at Unit 1 will be collected from 0 feet bgs at 07B101 and 07B105; and the duplicate soil samples at Unit 3 will be collected from 0 feet bgs at 07B303, 07B305, 07B307, 07B308, 07B310, and 07B313.</p>
<p>3A. [FSP Site 16: Section 2.2.1, Phase I Remedial Investigation; Section 2.2.2.1, Soil Sampling Results (Phase II); Section 4.1, Sampling</p>	<p>RESPONSE 3A: Section 2.2.2.1 of the Addendum to Attachment G (FSP) indicates that Tier 1 and 3 soil samples were collected during the Phase II RI at</p>

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<p>Program) Sections 2.2.2.1 and 4.1 discuss work performed and planned work, respectively. Section 2.2.2.1 indicates Tier 1 and 3 sample collection has been completed while Section 4.1 indicates that samples have been collected for Tiers 1 and 2. The text should be revised to explain or remove this apparent inconsistency.</p>	<p>Site 16. Section 4.1 of the Addendum to Attachment G (FSP) indicates that Tiers 1 and 2 have been completed at Site 16. The first statement referenced in Section 2.2.2.1 is stated to inform the reader of the types of sampling that were conducted during the Phase II RI. The second statement referenced in Section 4.1 is stated to inform the reader that shallow soil (less than 10 feet bgs) has been evaluated and will no longer be considered for human health risk evaluation at Site 16. The Phase II RI presented the results of the human health risk assessment for Site 16.</p>
<p>3B. Sections 2.2.1 and 2.2.2.1 list the chemicals previously targeted for analysis and the results of analyses indicating the organic compounds present and metals which occur at concentrations greater than background levels. The FSP does not indicate which metals are above background, and metals are not included in the current sampling and analysis scheme. It is recommended that the FSP discuss the reason metals found at concentrations greater than background are not of interest or considered COPCs.</p>	<p>RESPONSE 3B: The Phase II RI Report evaluated the concentrations, fate and transport, and human health risk associated with the concentrations of TAL metals present at Site 16. The following statement has been added to Section 2.2.2.2 of the Addendum to Attachment P (FSP) (page P2-6). "The results of the RI indicated that TAL metals above their respective background levels were present at Site 16, however: the nature and extent of TAL metals in soil has been defined; they do not pose an unacceptable risk to potential on-site resident (or on-site industrial worker); they are not likely to be leached downward through the soil profile; therefore TAL metals were not recommended to be addressed in future actions at Site 16."</p>
<p>4A. [FSP Site 16: Section 5, Request for Analyses; Section 5.1, Cone Pentrometer Test Sample Locations; Table P5-1, Site 16 Soil Gas and Groundwater Sampling Analyses; QAPP: Section 6.3.1, Duplicates] Field quality control (AC) samples are not discussed in the FSP, which cites Section 6 of the QAPP for field duplicate and blank sample collection frequencies. The QAPP discusses only soil and groundwater field duplicate collection. It is recommended that field duplicates be collected for soil gas analyses and discussed in the QAPP. It is recommended that Table P5-1 include field duplicate and blank sample collection information.</p>	<p>RESPONSE 4A: Soil gas duplicate samples will not be collected during the Phase II RI/FS at Site 16 due the high variability of soil gas samples. Section 6.3.2 of the QAPP (page 6-3) and Table P5-1 of the Addendum to Attachment P have been updated to indicate that a minimum of one soil gas blank will be collected per day of soil gas sampling.</p>
<p>4B. Section 5.1 indicates that 48 soil gas samples will be collected, while Table P5-1 indicates that 54 soil gas samples will be collected. This discrepancy should be resolved.</p>	<p>RESPONSE 4B: Table 5-1 has been updated to indicate that approximately 8 soil gas samples will be collected per CPT location. When multiplied by the estimated 6 CPT locations presented in Table 5-1, results in a total of 48 soil</p>

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	gas samples.
<p>5A. [QAPP: Table 4-1, Sample Containers, Preservatives, and Holding Times for Phase II RI/FS Analyses at Sites 7 and 16: Section 3.2.4.1, Analytical Methods and Detection Limits] Table 4-1 should be revised to include sample container, preservative, and holding time information for soil gas samples collected for the investigation.</p>	<p>RESPONSE 5A: The Addendum to Appendix P (page P-19), the Addendum to Attachment P (page P6-2), and the QAPP (Table 4-1) have been revised to indicate that soil gas samples will be collected via gas tight syringe and analyzed on-site by a mobile laboratory at Site 16.</p>
<p>5B. The QAPP indicates carbonate and bicarbonate fractions of alkalinity will be measured by EPA Method 310.1. Note that results measured by EPA Method 310.1 are as total alkalinity. If alkalinity fractions are desired it is recommended that Standard Methods SM2320 be Utilized.</p>	<p>RESPONSE 5B: Comment noted.</p>
<p>5C. The QAPP references "EPA Method SM3500" for ferric and ferrous iron analyses. SM3500 is not an EPA Method, but from Standard Methods. In addition, Table 4-1 indicates that both the sample preserved with nitric acid and hydrochloric acid will be used to determine ferrous iron. The sample preserved with nitric acid should be used for the determination of total iron, with ferric iron being the difference between the total and ferrous iron measurements.</p>	<p>RESPONSE 5C: Comment noted.</p>
<p>6. [QAPP: Section 7.2.3, Data Validation; Data Management Plan (DMP): Section 4.4, Data Validation and Review] Section 7.2.3 of the QAPP states that 80 percent of the data will be subjected to a Level III validation and 20 percent will be subjected to a Level IV validation, while Section 4.4 of the DMP states that 90 and 10 percent of the data will be subjected to a Level III and Level IV validation, respectively. This discrepancy should be resolved.</p>	<p>RESPONSE 6: Section 4.4 of the DMP (page 4-3) has been updated as follows "NFESC Level III validation will be performed on approximately 80 percent of the laboratory results submitted QC measurements, and data quality indicators...NFESC Level IV validation will be performed on approximately 20 percent of the laboratory results submitted."</p>
<p>7. [QAPP: Section 7.2.4.4, Duplicates] The equation describing the calculation of relative percent difference (RPD) should be revised to indicate that the denominator is the average of sample 1 and sample 2 concentrations rather than the concentration of sample 1.</p>	<p>RESPONSE 7: The equation describing the calculation of relative percent difference presented in Section 7.2.4.4 of the QAPP (page 7-4) has been revised to indicate that the denominator is the average of sample 1 and 2 concentrations.</p>

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<p>8. [QAPP: General] The following items are required by Region 9 and should be addressed in the QAPP:</p>	<p>RESPONSE 8: See responses to 8A, 8B, and 8C.</p>
<p>8A. The QAPP should include a provision for obtaining gas chromatography (GC) and gas chromatography/mass spectrometry (GC/MS) data on magnetic tapes along with other laboratory data deliverables. The tapes containing GC and GC/MS data should also be made available to Region 9 upon request.</p>	<p>RESPONSE 8A: This provision is not consistent with EPA guidance and has already been addressed by the SWDIV Quality Assurance Officer. The Navy does not concur with this request.</p>
<p>8B. Region 9 requires that copies of laboratory audit reports summarizing auditing activities and findings, and any corresponding corrective actions that were implemented as a result of these audit activities, be submitted to Region 9.</p>	<p>RESPONSE 8B: Comment noted.</p>
<p>8C. As a part of project surveillance Region 9 recommends that double blind PE samples be submitted to the laboratory. The QAPP should also include a provision for providing the results of PE sample analyses [discussed in Section 6.4.2 of the QAPP] to Region 9.</p>	<p>RESPONSE 8C: Section 6.4.2 of the QAPP has been revised to include double blind PE samples as part of the groundwater sampling program. The PE samples will be spiked by the EPA with one or both of the following VOCs: 1,1-dichloroethene and/or trichloroethene. PE samples will be analyzed by EPA Method 8021B. Implementation the PE sampling and analyses will require a focused effort by the EPA to meet the schedule restraints of the groundwater sampling program.</p>

**RESPONSE TO COMMENTS
DRAFT PLANNING DOCUMENT FOR THE OU-3B
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<p>Originator: Tayseer Mahmoud, RPM DTSC</p> <p>To: Joseph Joyce, BRAC Environmental Coordinator MCAS El Toro</p> <p>Date: February 11, 1999</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0178 File Code: 02221</p>
<p><u>GENERAL COMMENTS</u></p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p>
<p>1. <u>Draft Addendum to Appendix G Workplan (Site 7), Summary, Page G-I</u></p> <p>Site 7 consist of 5 units: Unit 1 (North Pavement Edge), Unit 2 (Old East Pavement Edge), Unit 3 (New East Pavement Edge), Unit 4 (Drainage Ditch), and Unit 5 (Open Dirt Area). This section of the Planning Document summarizes the proposal for conducting additional sampling at Units 1 and 3, but not 2, 4, and 5. DTSC agrees with the proposal for additional sampling at Units 1 and 3. However, additional information is needed regarding Units 2, 4, and 5. Figure G-5 depicts the sampling decision process flow chart. The second decision point in the flow chart requires the agreement of the BRAC Cleanup Team (BCT) that sufficient data has been collected. The document does not state that the BCT is satisfied that the available data is adequate. The document should summarize the investigation at Units 2, 4, and 5 to demonstrate that sufficient sampling was conducted and request BCT concurrence, or add a statement that the BCT agrees that the available data is adequate.</p>	<p>RESPONSE 1: A statement has been added to the to Summary page G-i that indicates that the BCT agrees that the available data for Units 2, 4, and 5 are adequate.</p>
<p>2. <u>Draft Addendum to Appendix G Workplan (Site 7), Calculating the Number of Samples Necessary to Determine Risk, Page G-25</u></p> <p>As stated in comment number one above, the rationale for determining that sufficient samples were collected from Units 2, 4, and 5 should be discussed.</p>	<p>RESPONSE 2: A statement has been added to Summary page G-25 that indicates that the BCT agrees that the available data are adequate to define the nature and extent of contamination and perform a human health risk assessment at Units 4 and 5 and that no further investigation is acceptable for Unit 2.</p>
<p>3. <u>Draft Addendum to Attachment P (Site 16, Crash Crew Pit No. 2), Field Sampling Plan, Page P6-2</u></p> <p>The field sampling plan addendum states that approximately 48 soil gas samples will be obtained at Site 16. The plan also states that sampling will be conducted using Bechtel's sampling and analysis</p>	<p>RESPONSE 3: The Addendum to Appendix P (page P-19), the Addendum to Attachment P (page P6-2), and the QAPP (Table 4-1) have been revised to indicate that soil gas samples will be collected via gas tight syringe and analyzed on-site by a mobile laboratory at Site 16.</p>

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protocol and California Regional Water Quality Control Board, Los Angeles Region (RWQCB-LA) soil gas guidelines. RWQCB-LA guidelines recommend using gas tight syringes to collect soil gas samples and performing the analyses with a mobile laboratory versus Bechtel's protocol of using tedlar bags. The use of gas tight syringes in conjunction with a mobile lab will minimize the loss of VOCs during transport of the sample and greater accuracy when calculating volatile mass.	

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<p>Originator: John P. Christopher, Staff Toxicologist DTSC</p> <p>To: Tayseer Mahmoud, RPM DTSC</p> <p>Date: January 19, 1999</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0178 File Code: 02221</p>
<p><u>GENERAL COMMENTS</u></p> <p>The brief work plan is generally consistent with procedures for risk assessment that we approved previously for this base. The work plan is acceptable overall, although we require one additional regarding dermal intake of chemicals in soil. Also, we offer a few minor comments for the Navy's consideration.</p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p> <p>RESPONSE: See responses to the comments below.</p>
<p><u>SPECIFIC COMMENTS</u></p> <p>1. <u>Definition of Units Within sites, p. 2:</u> We note that the Navy will define units within sites based on location, type of contaminants, and physiographic characteristics. Any such grouping of units should give highest consideration to re-use.</p>	<p><u>RESPONSES TO SPECIFIC COMMENTS</u></p> <p>RESPONSE 1: The Sites included in the RI include 7 and 14. Site 7 was previously divided into five units (Units 1-5) and Site 14 consists of one unit. For only Site 7 would any units be combined into areas of potential concern. According the Draft MCAS El Toro Community Reuse Plan the entire area of Site 7 is designated for Cargo.</p>
<p>2. <u>Cal/EPA Cancer Potency Factors, p. 7:</u> The Office of Environmental Health Hazard Assessment (OEHHA) of Cal/EPA will soon be issuing a new update of its cancer potency factors. Please check frequently with their website for the newest information (http://www.oehha.org).</p>	<p>RESPONSE 2: Comment noted.</p>
<p>3. <u>Adherence of Soil To Skin, Table 1, p. 8:</u> Department guidance for risk assessment recommends 1.0 mg/cm² as the default value for adherence of soil to skin in a residential or industrial setting. We require that the Navy estimate risks and hazards using this value. We are aware the USEPA Region IX has changed its recommendations to the values shown in Table 1. Presenting both calculations is the best way to satisfy the requirements of both agencies.</p>	<p>RESPONSE 3: The DTSC's soil-to-skin adherence factor of 1.0 mg/cm² is based on limited experimental data. It does not consider variations in the amount absorbed as a result of changes in exposure time, soil loading, or soil characteristics (it does not take into account site specific factors). In addition, the differences in the soil-to-skin adherence factor associated with different body parts (e.g., hands, face, forearms, lower legs) for various activities are not taken into account with use of the 1.0 mg/cm² factor. Chemical release from soil can be a limiting factor for dermal absorption in some cases. Using 1.0 mg/cm² as a default value for adherence of soil to skin would double work required to calculate human risk values at the OU-3B sites because an entirely separate calculation would need to be performed.</p>

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	<p>For consistency of approach at MCAS El Toro and to take advantage of more recent data interpretations, the Navy's approach will be to use U. S. EPA Region IX guidance adherence factor values at MCAS El Toro. These values agree with the proposed values presented in the "Risk Assessment Guidance for Superfund: Volume I, Human Health Evaluation Manual, Supplemental Guidance Dermal Risk Assessment Interim Guidance (May 1998). The Navy disagrees with the Department of Toxic Substances Control (DTSC) recommendation for a second calculation in the estimation of dermal exposure. The South West Division, Naval Facilities Engineering Command will support the soil-to-skin adherence factors of 0.3 mg/cm² for children and 0.08 mg/cm² for adults until further guidance is published.</p>
<p>4. <u>Ecological Risk Assessment, p. 9:</u> We concur that Sites 7 and 14 do not contain useable habitat for wildlife. Therefore, Phase I Predictive Assessments are not necessary.</p>	<p>RESPONSE 4: Comment noted.</p>
<p><i>CONCLUSIONS AND RECOMMENDATIONS</i></p> <p>The risk assessment work plan is consistent with methods we have approved previously for the base. It can be made acceptable upon inclusion of the value recommended by the Department for adherence of soil to skin, i.e., 1.0 mg/cm².</p>	<p>RESPONSE: Comment noted.</p>



BECHTEL NATIONAL INC.

CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-92-D-4670

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TO: Contracting Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 02R.RS
Building 127, Room 112
1220 Pacific Highway
San Diego, CA. 92132-5190

DATE: April 20, 1999
CTO #: 0178
LOCATION: MCAS El Toro

FROM: Jane W. V... for D. Tedaldi
Project Manager Program Manager

DESCRIPTION: Responses to Regulatory Agency Comments on the Draft Planning Documents
(Work Plans, Field Sampling Plans, QAPP, IDWMP, DMP, S&HP, RAWPA) for the
Remedial Investigation/Feasibility Study OU-3B Sites 7, 14, and 16 - DTD - Various

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CLEAN II Program
Bechtel Job No. 22214
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April 20, 1999

Contracting Officer
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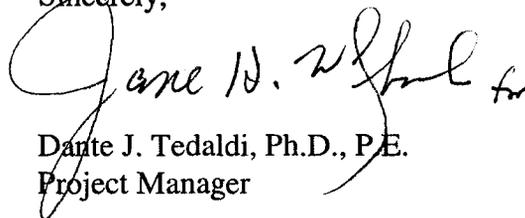
Subject: Responses to Regulatory Agency Comments on the Draft Planning Documents (Work Plans, Field Sampling Plans, QAPP, IDWMP, DMP, S&HP, RAWPA) for the Remedial Investigation/Feasibility Study OU-3B Sites 7, 14, and 16 Marine Corps Air Station, El Toro, California

Dear Mr. Selby:

It is our pleasure to submit these copies of the Responses to Regulatory Agency Comments on the Draft Planning Documents (Work Plans, Field Sampling Plans, QAPP, IDWMP, DMP, S&HP, RAWPA) for the Remedial Investigation/Feasibility Study OU-3B Sites 7, 14, and 16 Marine Corps Air Station, El Toro, California prepared under Contract Task Order (CTO) 0178 and Contract No. N68711-92-D-4670. We gratefully acknowledge the high level of cooperation and team work demonstrated by personnel from Southwest Division in preparation of the these documents.

We appreciate the opportunity to be of service to you on this project. If you have any questions or would like further information, please contact John Scholfield at (619) 744-3030 or me at (619) 744-3080.

Sincerely,


Dante J. Tedaldi, Ph.D., P.E.
Project Manager

DJT/sp

Enclosures: Responses to Regulatory Agency Comments on the Draft Planning Documents (Work Plans, Field Sampling Plans, QAPP, IDWMP, DMP, S&HP, RAWPA) for the Remedial Investigation/Feasibility Study OU-3B Sites 7, 14, and 16 Marine Corps Air Station, El Toro, California



Bechtel National, Inc. Systems Engineers-Constructors