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MCAS EL TORO  
SSIC #5090.3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

August 16, 2001

BRAC Environmental Coordinator  
Base Realignment and Closure, Environmental Division  
Attn: Mr. Dean Gould  
P.O. Box 51718  
Irvine, CA 92619-1718

RE: USEPA comments on draft Proposed Plan for Site 16, Marine Corps Air Station, El Toro,  
dated June, 2001

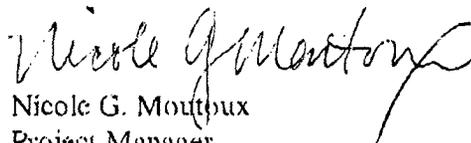
Dear Mr. Gould:

EPA has reviewed the above-referenced document and provides the enclosed comments. In general we find the format and content of the Proposed Plan acceptable. The enclosed comments are provided in order to clarify issues raised in the Plan. Please note that comments from EPA's legal staff will be forthcoming as soon as available.

Please also note that, although we do not address it in these comments, EPA has concerns with the No Further Action remedy proposed for vadose zone soils, as we will indicate in our comments to the draft final Focussed Feasibility Study for Site 16.

If you have any questions, please call me at (415) 744-2366.

Sincerely,

  
Nicole G. Moutoux  
Project Manager  
Federal Facilities Cleanup Branch

cc: Marc Smits, SWDIV  
Triss Chesney, DTSC  
Patricia Hamon, RWQCB  
Greg Hurley, RAB Community Co-Chair  
Marcia Rudolph, RAB Subcommittee Chair

**received**  
8/24/01

**Comments on draft Proposed Plan for Site 16  
Marine Corps Air Station, El Toro  
June, 2001**

General Comment

EPA has concerns with the feasibility of the Navy's preferred remedy because it allows contamination in the groundwater to migrate beyond its current footprint and therefore may not comply with groundwater ARARs. In fact, the remedy does not seem to meet one of the Navy's remedial action objectives stated on page 8 of the proposed plan. The Navy's second RAO is to "Prevent further migration of VOC-contaminated groundwater from the source area". By not providing containment of the plume, it is difficult to determine how the Navy is meeting this objective.

Specific Comments

1. Pg 1, second paragraph in right column: The Navy makes the following statement, "In general, the risks to human health for exposure to soil at the site are considered within U.S. EPA's allowable or generally allowable risk range under residential and industrial reuse scenarios." The term "in general" implies that some surface soil areas fall out of these categories. If so, they would require action. Please rephrase this sentence.
2. Pg 1, last sentence: This sentence ends with "by the..." and does not finish up on then next page.
3. Pg 2, 1<sup>st</sup> paragraph of second column: Second sentence has a typo, "provinces " should be "provide".
4. Pg 2, Last paragraph under Units 1 and 2: In this paragraph, the Navy makes reference to the petroleum contamination which exists at the site and that it will be addressed at a later date. Since these contaminants are commingled, please provide a justification of why it makes sense to handle this contamination separately and not simultaneously with the VOC clean up of soils and groundwater.
5. Pg 7, Table 3: In describing risk management considerations for Unit 3, please include the percentage of risk contributed by each chemical. For example, how much of the risk is due to PAHs
6. Pg 9, Figure: The legend on the figure refers to a "containment plume". Should this say "contaminant plume"? If not, what is a containment plume?
7. Pg 10, Compliance with ARARs: As noted in the general comment above, given that

alternative 2 allows migration of the contaminated groundwater above MCLs, EPA is unsure that groundwater ARARs have been satisfied.

8. Pg 15, second bullet: The Navy states that "movement of the MCL line of the VOC plume is expected to be minimal". This statement does not seem to be substantiated in either the proposed plan or the focussed feasibility study however it appears to be a primary basis for the preferred remedy. Please provide further explanation of this statement.