



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

FILE
EPA
M60050.002675
MCAS EL TORO
SSIC #5090.3

February 3, 1998

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 Soil Vapor Extraction System (SVE) Design Work Plan, Site 24,
MCAS El Toro, CA, January, 1998

Dear Mr. Joyce:

The United States Environmental Protection Agency (EPA) has reviewed the document referenced above. Overall the document was well written. There are several areas however outlined below that need to be addressed prior to submitting the Draft Final SVE Work Plan. Also, attached please find technical comments supplied by Herb Levine, EPA's hydrogeologist for MCAS El Toro.

- 1) ARARS - Please list or reference the ARARs and TBCs that were in effect the date the ROD was signed and therefore are part of the remedy. They should be characterized as chemical-specific, location-specific, or action-specific. The text mentions that "hazardous waste determinations will be at the time waste is generated." What steps will be taken to determine if a waste is hazardous and what steps will be taken if such a determination is made?
- 2) Land-Use Restrictions - Please point out situations where institutional controls are needed such as easements, water-use restrictions, etc., and note the parties who have specific responsibilities for implementing the controls such as DOD, the state, or local government.
- 3) Community Involvement Activities - The work plan should contain a schedule for updating the Community Involvement Plan (CIP) to reflect the remedial activities that will take place. The CIP itself should contain the necessary activities such as fact sheet preparation, updating mailing lists, community interviews, public meetings, etc.
- 4) Pre-design Phase submittals - In addition to a Contingency Plan, the Work Plan schedule should contain deliverables for a Site Management Plan, a Health and Safety Plan, a Field Sampling Plan, and a Quality Assurance Project Plan. Existing documents may be updated to reflect the new activities.

received
2/9/98

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

Sincerely,

A handwritten signature in cursive script that reads "Glenn R. Kistner".

Glenn R. Kistner
Remedial Project Manager
Federal Facilities Cleanup Branch

Attachment

cc: Greg Hurley, RAB Co-Chair
Tayseer Mahmoud, DTSC
Andy Piskin, SWDIV
Larry Vitale, RWQCB



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MEMORANDUM

February 2, 1998

SUBJECT: Review of Draft Soil Vapor Extraction System Design
Work Plan, Site 24, MCAS El Toro

From: Herbert Levine, Hydrogeologist
Technical Support Team

A handwritten signature in black ink, appearing to read "Herbert Levine", written over the typed name.

To: Glenn Kistner, RPM
Navy Section

I have reviewed this document and found it to be well written and well organized. I only have a couple of comments to make. With regards to well field design, I would recommend considering using passive air intake wells to facilitate flow. This may prove to be beneficial since most of the area to be remediated is covered with concrete. Also, the Navy should be aware that the EPA HYPERVENTILATE software was designed and intended for screening purposes only, not for well field design(see *Review of Mathematical Modeling for Evaluating Soil Vapor Extraction Systems*, EPA/540/R-95/513, July 1995). With regards to monitoring, the Navy should consider several items. First is collecting soil samples in addition to soil gas as both part of the rebound study and as confirmation sampling. Second, the rebound study should be defined in the design document. The third item related to monitoring, and maybe this should be part of the rebound discussion is system optimization. It may be likely that the system as originally designed and operated may not be sufficient to reach the remedial goals. Often we find that after the intitial design and operation the remedial goals are not met and the systems are optimized. System optimization may include modification of well field, change of extractions rates, addition of heat, to name a few. Some discussion on optimization would be appropriate in case as a contingency in case the remedial goals are not met with the initial design.