



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

M60050.002837
MCAS EL TORO
SSIC NO. 5090.3

March 7, 2002

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

RE: Draft ROD for OU-1, Sites 18 and 24, Marine Corps Air Station, El Toro, CA dated
January 2002

Dear Mr. Gould:

EPA has reviewed the draft Record of Decision (ROD) for Sites 18 and 24 and finds it to be well-written and in general complete. The enclosed comments are offered primarily for clarity. Comments from EPA's Office of Regional Counsel will be forwarded early next week. The comments from Regional Counsel will address EPA's position on the DON's discussion of institutional controls in the draft ROD.

If you have any questions, please call me at (415) 972-3012.

Sincerely,

Nicole G. Moutoux
Project Manager
Federal Facilities Cleanup Branch

cc: Triss Chesney, DTSC
Patricia Hannon, RWQCB
Jerry Werner, RAB Community Co-Chair
Marcia Rudolph, RAB Subcommittee Chair

received
3/15/02

**EPA Comments on draft ROD for Sites 18 and 24
Marine Corps Air Station, El Toro
March, 2002**

1. Page 4, Declaration: Please change the EPA signature block to Ms. Deborah Jordan.
2. Page 2-5, Recent Evaluations and Assessments: Please update the schedule for the draft Radiological Release Report to reflect the Navy's most recent information.
3. Page 5-24, Vadose Zone Remediation: Please update the schedule given for the final report for Site 24.
4. Page 9-4, Table 9-2: As in the Proposed Plan, Table 9-2 should contain a footnote regarding the amount of mass removed using Alternative 8A in the first 20 years.
5. Page 9-6, Long-Term Effectiveness and Permanence: It is mentioned that Alternatives 6A, 8, and 8A would be most effective in removing mass in the first 20 years. Please expand on this. Why are they most effective?
6. Page 10-1, Groundwater Remediation: In this section, the Navy states that the exact number and locations of wells for Alternative 10B' will be discussed during the remedial design phase. This statement is not made with regard to Alternative 8A. However, it is stated in the Proposed Plan for Sites 18 and 24 that by "further optimizing the well placement of the extraction wells in the remedial design phase, remediation time may be significantly shortened". This statement refers to Alternative 8A. We feel that, just as with Alternative 10B', discussions regarding placement and number of wells for Alternative 8A should take place during remedial design. A statement to this effect should be added to the ROD.
7. Page 10-5, Figure 10-2: The colors used to show plume concentrations are very difficult to read. Please revise the map to use more contrasting colors.