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MCAS EL TORO  
SSIC NO. 5090.3



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

March 19, 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:

Enclosed are comments from EPA's Office of Regional Counsel regarding the draft ROD  
for Sites 18 and 24. Please note that these comments address legal concerns other than  
Institutional Controls which the Navy and regulatory agencies are addressing separately.

Please call me at (415) 972-3012 if you have any questions.

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  
Polin Modanlou, MCAS El Toro Local Redevelopment Committee

received  
3/25/02

**Comments on draft ROD, Sites 18/24  
Marine Corps Air Station, El Toro**

1. P. 5-26: Third to the last paragraph - Last sentence here makes reference to 10 ug/L. Please provide an explanation of the significance of this number.
2. P. 5-27: Last paragraph in Section 5.2.3.6 - Last sentence states that site-wide implementation of air sparging would be problematic because of the heterogeneities in the aquifer. There should be a follow-up sentence here that draws out the implication of this. Something like "Therefore, DON determined that ...."
3. P. 10-2: First bullet at the top of the page - There is reference to a "Central Treatment Plan" Shouldn't it be "Plant?"
4. P. 10-9: Top of the page - There is a reference here to 40 CFR 300.430 (f)(1)(ii)(C)(3). Please put in brackets what this requirement is.
5. P.10-10: First paragraph under Section 10.6 - Last sentence states one option being considered is injection into the principal aquifer. What are the requirements that must be complied with if this option for reinjection is implemented?
6. P. 11-3: First row - Under comments, include a statement that Sites 18 and 24 are not TSD facilities. Second row - Under comments, delete reference to "RCRA" or "RCRA hazardous waste" since this is only addressing non-RCRA hazardous waste.
7. P. 11-4: Second row - Under comments, there is a reference to "waste discharge requirements." WDRs apply to discharges to surface water. Since there is no discharge to surface water in this remedial action, please delete this reference.
8. P.11-5: First row - Under comments, please describe in parenthesis what "Chapters 2 through 4" are. Are these the Implementation Plans?
9. P.11-6: First bullet in Section 11.2.1 - see comment above regarding waste discharge limitation. Second bullet refers to secondary MCLs. Are there secondary MCLs that are being used here as cleanup levels? If not, please delete reference to secondary MCLs.
10. P.11-13: Section 11.2.1.2 - This explains how MCLs are applied at CERCLA remedies, i.e., they must be attained throughout the contaminated plume or at and beyond the edge of the waste management area when the waste is left in place. Which one is being applied here?
11. P.11.5: Under Section 11.4, which is Utilization of Permanent Solutions, the last sentence in the first paragraph states that during implementation workers will use protective equipment etc. Does this statement about risk to workers not go under the "Short term Effectiveness" criteria rather than Utilization of Permanent Solutions?