

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

24 October 2005

Mr Darren Newton
BRAC Environmental Coordinator
Base Realignment and Closure
Marine Corps Air Station El Toro
7040 Trabuco Road
Irvine, CA 92618

RE: Draft Record of Decision (ROD), Operable Unit 2A, Installation Restoration Program
(IRP) Site 24 – VOC Source Area Vadose Zone,
Former Marine Corps Air Station (MCAS) El Toro, California

Dear Mr. Newton:

The U.S. Environmental Protection Agency (EPA) has completed its review of the subject Draft ROD. The EPA concurs with the selected no further action remedy at IRP Site 24. EPA has the following comments on the draft document.

If you should have any questions, please feel free to call me at 415-972-3349.

Sincerely,



Rich Muza
Remedial Project Manager
Federal Facility and Site Cleanup Branch

cc. Content Arnold, NFECSSW SDIEGO
Frank Cheng, DTSC
John Broderick, RWQCB
Bob Woodings, RAB Co-Chair
Marcia Rudolph, RAB Subcommittee Chair

received
11/1/05

**COMMENTS ON THE DRAFT RECORD OF DECISION, OPERABLE UNIT 2A, SITE
24 – VOC SOURCE AREA VADOSE ZONE,
FORMER MCAS EL TORO, CALIFORNIA**

1. Declaration, Page 2 – “The Department of the Navy and the DTSC have determined that further remedial action is not required...” Since the signatories to the Federal Facility Agreement (FFA) have all agreed to the conclusions of the Closure Report, would it not be correct to say that all of the regulatory agencies have determined the site requires no further action? It is recommended that this statement be clarified.

2. Declaration, Authorizing Signatures – The signature block for EPA is incorrect. The correct information is:

Kathlene H. Johnson, Chief
Federal Facility and Site Cleanup Branch
United State Environmental Protection Agency, Region 9

Please correct this information in the revised ROD.

3. Section 2.3, Page 2-4 – The “Final Groundwater Monitoring Report “ for Round 21 was received by EPA last month. It is recommended that the information on the number of groundwater monitoring rounds conducted at the former MCAS El Toro be updated as appropriate.

4. Table 2-1 – It is recommended that the final statement under “Summary of Findings” for the FFS for OU-3B Site 16 be deleted.

5. Section 3.1, Page 3-1 – “The RAB meeting held in July 2005 was the 76th meeting.” The 77th RAB meeting was held in September 2005. It is recommended that this information be updated as appropriate.

6. Section 3.1, Page 3-2 – The final paragraph of this section provides much extraneous information on the Feasibility Study and agencies’ input while this section focuses on RAB issues. It is recommended that the extraneous sentences provided here be deleted.

7. Section 5.2.2.1, Page 5-11 & Tables 5-1 & 5-2 -- The information provided does not allow for one to assess the source of the soil gas threshold concentrations. It is EPA’s understanding that the Department of the Navy (DON) agreed to re-evaluate the shutoff criteria (ie., soil gas threshold concentrations) in this ROD. Where in the ROD will this re-evaluation be presented?

8. Section 7.7.1, Page 7-14 – As mentioned in the text here as well as in Comment 7 above, the DON agreed to re-evaluate the shutoff criteria (ie., soil gas threshold concentrations) in this ROD. While Section 7.7.2 presents information provided in an attachment to the Proposed Plan titled “Attainment of Remedial Action Objectives, Site 24 VOC Source Area, Installation Restoration Program, Former Marine Corps Air Station El Toro” (May 2005), the discussion here in the ROD does not re-evaluate the threshold concentrations as per the previous agreement on the Interim ROD. It is recommended that the necessary information be cited here and provided as an appendix to the ROD.

9. Section 7.7.2, Page 7-15 – “Groundwater concentrations were also monitored, and the VOC concentrations generally declined during SVE operations indicating that the vadose zone source was no longer degrading groundwater.” This conclusion may be the case depending on the actual distance of these monitoring wells from the active soil vapor extraction (SVE) system. However, another possibility is that the effective depth of the SVE system in the proximity of the monitoring wells in question acted to volatilize VOCs from ground water into the deeper vadose zone. Based on the possibility of this second hypothesis, it is recommended that the above statement be caveated to state that the generally declining concentrations in ground water was a possible indication that the vadose zone source was no longer degrading ground water.

10. Section 7.7.2, Page 7-15 – “SVE may be used to remove VOCs that volatilize from groundwater into the deep vadose zone during the course of groundwater remedy implementation.” Later in Section 8 it is stated that “SVE was incorporated into the groundwater remedy and may be selectively applied in dewatered source area zones at Site 24 for mass removal enhancement.” The first statement implies that further VOCs removal via SVE would be from the deep vadose zone, while the second concept considers VOCs removal via SVE from dewatered areas within the ground-water unit underlying Site 24. Which case is the focus of the potential use of SVE as a compliment to the ground-water extraction system being installed at Site 24? It is recommended that this issue be clarified in the ROD.

11. Section 7.7.2, Page 7-15 – “A DON letter dated 26 July 2000 to the RWQCB...documented regulatory agreement on the reevaluation and acceptability of the soil gas threshold values established in the Interim ROD as soil cleanup criteria.” There have been a number of citations in the ROD regarding the re-evaluation of the soil gas threshold values due to previous concerns raised by the RWQCB. It is recommended that the information developed to re-evaluate the threshold values be summarized and provided as an appendix to the ROD.

12. Section 8, Page 8-1 -- “However, SVE was incorporated into the groundwater remedy and may be selectively applied in dewatered source area zones at Site 24 for mass removal enhancement.” Earlier in Section 7.7.2 it is stated “SVE may be used to remove VOCs that volatilize from groundwater into the deep vadose zone during the course of groundwater remedy implementation.” The first statement considers that VOCs will be removed via SVE from dewatered areas within the ground-water unit underlying Site 24, while the second concept implies that further VOCs removal via SVE would be from the deep vadose zone. Which case is the focus of the potential use of SVE as a compliment to the ground-water extraction system being installed at Site 24? It is recommended that this issue be clarified in the ROD.