



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

M60050_003492
MCAS EL TORO
SSIC NO. 5090.3.A

June 6, 2001

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

RE: Draft Workplan, Preliminary Assessment, Building 307, Marine Corps Air Station, El Toro, dated May, 2001

Dear Mr. Gould:

EPA has reviewed the above-referenced workplan for the investigation that focusses primarily Building 307 and the attached sewer line. In general, we find the approach appropriate, however we have several comments and questions (below) to which we request a response before the Navy begins fieldwork.

General Comment

1. Please provide justification for the COPCs selected. Given that the activities in building 307 began over 50 years ago, is it possible that chemicals other than PCE were used in the dry-cleaning operation?

Specific Comments

1. p. 3-1, Decision Inputs: The decision threshold values referenced from the Draft Final Interim ROD for Site 24 may not be appropriate for this site. These values should be calculated on a site-specific basis. The Navy should provide an explanation of how these values will be used and whether they are reasonable for this site.

2. p. 3-2, Decision Rules: These rules indicate that groundwater will not be sampled if contamination is not found in soil gas samples below 0-15 feet bgs. Because releases could have occurred over 50 years ago, relying on samples from such shallow depths without sampling groundwater may not be adequate. EPA recommends that the Navy consider sampling groundwater even if shallow soil gas sampling does not indicate contamination at the shallow depths.

received

Sincerely,

A handwritten signature in cursive script, reading "Nicole G. Moutoux".

Nicole G. Moutoux
Project Manager
Federal Facilities Cleanup Branch

cc: Don Whittaker, SWDIV
Triss Chesney, DTSC
Patricia Hannon, RWQCB
Greg Hurley, RAB Community Co-Chair
Marcia Rudolph, RAB Subcommittee Chair