



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

December 15, 1995

Joseph Joyce
BRAC Environmental Coordinator
Environment and Safety (Code 1AU)
MCAS El Toro
P.O. Box 95001
Santa Ana, CA 92709-5001

Dear Mr. Joyce:

EPA has reviewed the "Draft Work Plan for Air Sparging, Pilot Testing" for MCAS El Toro, received on November 6, 1995. Please address the enclosed comments (Enclosure A) in either a revised report or technical memorandum. If you have any questions, I can be reached at 415/744-2368.

Sincerely,

A handwritten signature in cursive script that reads "Bonnie Arthur".

Bonnie Arthur
Remedial Project Manager
Federal Facilities Cleanup Office

cc: Mr. Juan Jimenez, DTSC
Mr. Larry Vitale, RWQCB
Mr. Larry Nuzum, SW DIV
Mr. Dante Tedaldi, Bechtel

ENCLOSURE A

EPA Comments on the Draft Work Plan for Air Sparging Pilot
Testing, MCAS EL Toro, California

1. Please coordinate the schedule with the BCT during our weekly conference call/field meetings.
2. Section 2.1, 24CPT66 does not record a sand and gravelly sand at approximately 150 ft bgs.
3. Section 2.2, the last sentence suggests that the vertical movement of water is limited by the silts and clays which bound the saturated sands. As discussed at our 12/13/95 weekly field meeting, EPA is not confident that air will be able to move through these much less permeable beds.
4. Section 3.3.1, which monitoring wells are to be used in this phase? How will SVE capture radius be determined? A schedule for each phase would be helpful. When and how will the Navy evaluate intrinsic biodegradation of VOCs?
5. Section 3.3.2, which monitoring wells are to be used in this phase? How will VOC concentrations be measured in groundwater from the air sparge wells? What are the criteria for determining negative pressure during the air sparging phase.
6. Please add a section describing how the data will be evaluated.