



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

May 20, 1997

Mr. Joseph Joyce
BRAC Environmental Coordinator
AC/S, Environment (1AU)
MCAS El Toro
P. O. Box 95001
Santa Ana, CA 92709-5001

Re: EPA Review of MCAS El Toro Draft Final Phase II RI/FS Addendum, Site 25- Major Drainages, and Response to Comments, April 1997

Dear Mr. Joyce:

Please find attached to this cover letter, the United States Environmental Protection Agency's (EPA) review comments of the above documents. Comments have been provided by Clarence Callahan of EPA's technical support staff.

If you would like to discuss these comments, please contact me at (415) 744-2210.

Sincerely,

A handwritten signature in cursive script that reads "Glenn R. Kistner".

Glenn R. Kistner
Remedial Project Manager
Federal Facilities Cleanup Branch

Attachment

cc: Clarence Callahan, EPA
Tayseer Mahmoud, DTSC
Larry Vitale, RWQCB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco CA 94105-3901
May 6, 1997

MEMORANDUM

SUBJECT: Review of El Toro Site 25 Response to Comments
FS Ecological Risk Assessment

FROM: Clarence A. Callahan, Ph.D., Biologist
BTAG Coordinator
Technical Support Team (SFD8B) *Callahan*

TO: Glenn Kistner, Remedial Project Manager
Navy Section (SFD82)

The material presented in response to my comments is generally lacking because of the uncertainties resulting from the questionable methods used resulting in an underestimate of risk. The use of literature values to develop toxicity reference values from sources other than those approved by Region 9, the lack of data for some of the pathways (e.g., insect food for receptors) and an inadequate risk characterization are the "big picture" items that are lacking for this effort.

I would suggest that, at a minimum, a statement be placed in the Conclusions and Recommendations in Chapter 8 as follows:

"A definitive assessment of the actual ecological risk to the Site 25 receptors is not possible at this time because of remaining uncertainties with respect to the estimates of ecological impact to the site receptors. Although, chemical contamination is present at Site 25 at levels that may impact natural resources, the preferred action of the Navy is management of the residual risk."

cc: Chip Demerest
Department of the Interior
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