

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

26 November 2008

Marine Corps Air Station El Toro  
Base Realignment and Closure  
Attn: Ms. Debra Theroux  
Deputy Base Closure Manager  
7040 Trabuco Road  
Irvine, California 92618

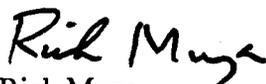
RE: Draft Pilot Study Work Plan, Installation Restoration Program (IRP) Site 1  
Former Marine Corps Air Station (MCAS) El Toro, California

Dear Ms. Theroux:

EPA has reviewed the subject work plan. EPA concurs with the pilot study protocols presented in the Work Plan. However, we have identified some general issues within the Appendix A, Sampling and Analysis Plan (SAP) for the Navy's consideration in finalizing the document; we have also indicated missing information that we request be submitted prior to work plan finalization. We provide these comments on the draft SAP in the attachment.

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

Sincerely,



Rich Muza  
Remedial Project Manager  
Federal Facility and Site Cleanup Branch

cc Content Arnold, NFECSSW SDIEGO  
Jim Callian, NFECSSW SDIEGO  
Qunag Than, DTSC  
John Broderick, RWQCB  
Bob Woodings, RAB Co-Chair  
Marcia Rudolph, RAB Subcommittee Chair

received  
12/8/08

COMMENTS ON THE DRAFT PILOT STUDY WORK PLAN, IRP SITE 1  
FORMER MCAS EL TORO, CALIFORNIA

1. Appendix A, Sampling and Analysis Plan, General -- EPA has identified some editorial issues within the Appendix A, Project-Specific Sampling and Analysis Plan (SAP) that should be addressed for the final SAP. Specific examples include:

- Section 14.8, Page 45 of 122 -- “A detailed protocol for collecting samples using Snap Sampler™ is included in Appendix A of the work plan”; Appendix A of the work plan is the SAP in which the text occurs.
- SAP Worksheet #15: Reference Limits and Evaluation Table -- Incorrect MCLs are cited here as the “project action limit” for VOCs.
- SAP Worksheet #18: Sampling Locations and Methods/SOP Requirements Table -- Errors are found in the footnotes to the tables.
- SAP Worksheet #21: Project Sampling SOP References – The “comments” refer to a “SOP presented in Attachment 1 of the Work Plan”; there is no Attachment 1 of the Work Plan.
- SAP Worksheet #22: Field Equipment Calibration, Maintenance, Testing, and Inspection -- The “comments” refer to a “SOP presented in Attachment 1 of the Work Plan”; there is no Attachment 1 of the Work Plan.
- SAP Worksheet #24: Analytical Instrument Calibration Table – Footnote numbers are indicated but no footnotes are provided at the end of the tables.
- SAP Worksheet #25: Analytical Instrument and Equipment, Maintenance, Testing, and Inspection -- Footnote numbers are indicated but no footnotes are provided at the end of the tables.
- SAP Worksheet #30: Analytical Services – A footnote number is indicated but no footnote is provided at the end of the tables.

It is recommended that a full review for these these types of errors be completed and addressed in the final document.

2. Appendix A, Sampling and Analysis Plan, General – As noted in Comment #1 above, a number of worksheets within the SAP indicate that SOPs will be presented in “Attachment 1”. However, there is no “Attachment 1” to either the Work Plan or the SAP and the referenced SOPs have not been provided elsewhere in the document. It is recommended that the missing SOPs be provided for regulatory review as soon as possible and prior to finalization of the Work Plan.