

Department of Toxic Substances Control



Edwin F. Lowry, Director
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Gray Davis
Governor

Winston H. Hickox
Secretary for
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Protection

August 6, 1999

Mr. Dean Gould
BRAE Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
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COMMENTS ON DRAFT FINAL CERCLA GROUNDWATER MONITORING PLAN FOR MARINE CORPS AIR STATION (MCAS) EI TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated June 1999. The document presents the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Groundwater Monitoring Plan (GMP). We also reviewed the Draft Final Evaluation of Perchlorate in Groundwater dated July 1999 and responses to regulatory agencies comments. DTSC comments are as follows:

1. DTSC agrees with your proposal to conduct two additional rounds of groundwater monitoring for perchlorate. We also agree with the recommendation of the report to continue to monitor the wells that consistently exhibit low levels of perchlorate. The report states that perchlorate will be monitored on a regular basis. The report should specify the frequency of sampling. Please note that the U.S. EPA sent comments on June 3, 1999 and recommended sampling frequency for some wells. To date, we did not receive a response to their comments.
2. The Marines requested that DTSC recommend additional wells to be sampled for perchlorate. Based on our review of the document, we recommend at least monitoring wells 19_UGMW35 and 06_DGMW69 be monitored for perchlorate. These wells should be monitored because the detections of perchlorate in wells 19_DGMW86 and 07_DBMW100 may be from the ordnance storage bunkers or a source other than the landfills.

Mr. Dean Gould
August 6, 1999
Page 2

If you have any questions, please call me at (714) 484-5418.

Sincerely,



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Mr. Dean Gould
August 6, 1999
Page 3

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