



Winston H. Hickox
Secretary for
Environmental
Protection

Department of Toxic Substances Control

Jesse R. Huff, Director
5796 Corporate Avenue
Cypress, California 90630

M60050.000250
MCAS EL TORO
SSIC #5090.3



Gray Davis
Governor

March 15, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
AC/S, Environmental (1AU), BRAC Building #899
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

COMMENTS ON TECHNICAL MEMORANDUM PROGRESS REPORT, PHASE I VADOSE ZONE REMEDIATION ACTIVITIES, SITE 24, MARINE CORPS AIR STATION (MCAS) EL TORO

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject report dated February 12, 1999. The progress report describes start-up and testing activities that were conducted during the period from late December 1998 through late January 1999. Based on our review of the document, we request the following be incorporated into future submissions of Monthly Progress Reports:

In Exhibits 1 through 4, the *Monthly Progress Report* compares the numerical values of various TCE concentrations collected as of January 1999 from various soil vapor extraction wells and piezometers to that of the target threshold value of the *Interim Record of Decision* (ROD).

The types of concentration comparisons offered in the *Monthly Progress Report* are useful as a very general yardstick of remediation progress. However, DTSC would like to caution that those comparisons should not be taken beyond their general sense. The reason for this is that the concentration data from the various soil vapor extraction wells were collected during variable dynamic and static conditions, which are difficult to compare. In addition, the dynamic soil vapor data were collected at various times during the extraction operations whose duration varied widely. Similarly, the static concentration values were collected at various times after extraction periods. Also, the soil vapor wells interact pneumatically, which further complicates the analysis of the subsurface concentrations during unsteady state conditions. Thus, such high variability of conditions makes comparison of data points to each other and to the ROD values difficult at this time.

Mr. Joseph Joyce
March 15, 1999
Page 2

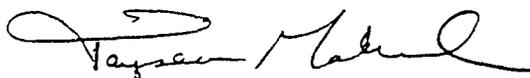
As an example, consider the two bar charts that indicate the TCE soil vapor concentrations around Buildings 296 and 297. The charts mix static concentrations from piezometers with dynamic concentrations from operating extraction wells. In addition, the dynamic data from the wells were collected at the end of test runs that were of variable durations. Since soil vapor concentrations decrease the most during the initial phases of any extraction, data collected at the end of 1-day tests may not be comparable to those which were collected at the end of 7-day tests.

At this stage of the design, most of the data comes from short-term flow tests and from piezometers. Because such data are generated under different conditions and are therefore not fully comparable, DTSC requests that graphics be eliminated from the *Monthly Progress Report* until routine extraction well concentration monitoring data is available that can be cross-referenced to sustained regional operational periods.

To effect the collection of routine concentration data, DTSC requests that concentration (using appropriately calibrated PID), applied vacuum, status of air dilution valves (if any), and extraction flow rates be monitored at the head of each operating extraction well on at least a quarterly basis, e.g., March, June, September, and December. To avoid data gaps for extraction wells that are not operated continuously from one quarter to the next, such extraction wells should be monitored just prior to shut down. Similarly, DTSC requests that all extraction wells that are started up between monitoring periods be monitored within the first day of their start-up, and then regularly under the quarterly schedule. We also request that such information be integrated into a tabular format and cross-referenced to the various operating events, involving the soil vapor extraction system. Such information should then be submitted in the appropriate *Monthly Progress Reports*.

DTSC values the opportunity to comment on the various ongoing activities and events that shape the remediation of the site, and to work cooperatively toward the eventual cleanup of the site. If you have any questions, please call me at (714) 484-5418.

Sincerely,



Tayseer Mahmoud
Remedial Project Manager
Office of Military Facilities
Southern California Operations

cc: See next page.

Mr. Joseph Joyce
March 15, 1999
Page 3

cc: Mr. Glenn Kistner
Remedial Project Manager
U. S. Environmental Protection Agency
Region IX
Superfund Division (SFD-8-2)
75 Hawthorne Street
San Francisco, California 94105-3901

Ms. Patricia Hannon
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

Mr. Gregory F. Hurley
Restoration Advisory Board Co-chair
620 Newport Center Drive, Suite 450
Newport Beach, California 92660-8019

Ms. Polin Modanlou
MCAS El Toro Local Redevelopment Authority
10 Civic Center Plaza, 2nd Floor
Santa Ana, California 92703

Mr. Laszlo Saska, P.E.
Department of Toxic Substances Control
Hazardous Substances Engineer
Engineering Services Unit, HQ-29
P.O. Box 806
Sacramento, California 95812-0806

Mr. Dave B. DeMars
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division - Code 5BME.DD
1220 Pacific Highway
San Diego, California 92132-5187

Mr. Joseph Joyce
March 15, 1999
Page 4

cc: Mr. Crispin Wanyoike
Earth Tech, Inc.
100 West Broadway, Suite 5000
Long Beach, California 90802

TRANSMITTAL

Date: 25 October 1999

From: Lynn Marie Hornecker
MCAS El Toro

To: Diane Silva
Code 01LS.DS

Subj: Administrative Record Materials
Marine Corps Air Station, El Toro

Installation: Marine Corps Air Station, El Toro

UIC Number: MC0050

Document Title (or subject): Progress Report, Vadose Zone Remediation,
Site 24

Author: Cal EPA, DTSC

Recipient: Joseph Joyce, MCAS El Toro

Record Date: 15 March 1999

Approximate Number of Pages: 4

EPA Category: 01.1

Sites: Site 24

Key Words: ~~REMED~~ Remediation; SVE

Contract: N/A

CTO Number: N/A