



Winston H. Hickox  
Secretary for  
Environmental  
Protection

## Department of Toxic Substances Control

Edwin F. Lowry, Director  
5796 Corporate Avenue  
Cypress, California 90630

M60050.000366  
MCAS EL TORO  
SSIC NO. 5090.3



Gray Davis  
Governor

September 15, 1999

Mr. Dean Gould  
BRAC Environmental Coordinator  
U.S. Marine Corps Air Station - El Toro  
P.O. Box 51718  
Irvine, California 92619-1718

### **COMMENTS ON THE PROGRESS REPORT, VADOSE ZONE REMEDIATION, VOLATILE ORGANIC COMPOUND SOURCE AREA, IRP SITE 24, MARINE CORPS AIR STATION (MCAS) EL TORO**

Dear Mr. Gould:

The Department of Toxic Substances Control (Department) has completed the review of the above subject report (Progress Report), dated August 1999. The Progress Report describes start-up and testing activities of the soil vapor extraction (SVE) system that were conducted through the end of July 1999.

In Table 2-2 on page 2-3, the Progress Report presents a modified sampling and monitoring schedule for the extraction wells and the treatment system. As you are aware, the sampling and monitoring schedule was recently modified to eliminate discrepancies between the field sampling activities and those originally proposed in the System Evaluation and Optimization Report and in the Sampling and Analysis Plan. While Table 2-2 clarifies the frequencies in question, the Department would like to state its understanding of the specific details associated with the issue. Specifically, with respect to the field measurements of the extraction well vacuum, flowrate, and concentrations, it is the Department's understanding that: 1) the SVE system startup was on May 17, 1999; 2) the sampling frequency for flow rates, vacuum, and vapor concentration (using an on-site mobile lab) of SVE wells is biweekly, beginning the week after startup (week no. 1), which was the week of May 24, 1999; 3) biweekly sampling takes place on odd weeks (week no. 1, -3, -5, etc.); and 4) the biweekly extraction well sampling schedule will be in effect through the end of Phase II Operations, ending 18 months after startup, or about November 10, 2000. Based on the above, biweekly extraction well sampling occurs on the weeks of May 24, June 7, and 21, July 5 and 19, August 2, 16, and 30, September 13 and 27, and so on. Wells that are brought on-line during an even week will be sampled 24 hours after startup, followed by the biweekly sampling on odd weeks. In addition to the above biweekly sampling, all operating wells will be sampled and analyzed by Methods TO-14 / 8021 in a remote laboratory at week 15, which was the week of August 30. The same sampling and analysis will be followed after months 6, 8, 12, and 18.

Mr. Dean Gould  
September 15, 1999  
Page 2

If the Department's understanding, as indicated above, is not consistent with that of the Navy's, please contact the Department for discussion.

The Department's remaining comments address relatively minor issues:

- 1) No flow rates and vacuum are indicated in Appendix A for extraction wells 24SVE35 (week of 6/23/99), 24SVE138A (week of 6/7/99), and 24SVE147A (week of 6/7/99).
- 2) No concentration values are indicated for well 24SVE106 the week of 7/5/99.
- 3) No field measurements are indicated for wells 24SVE35, 24SVE35A, and 24SVE35B for the weeks of 7/5/99 and 7/19/99.
- 4) Several of the figures in the Progress Report suggest that vapor concentration data were plotted in the figures but are not listed in Appendix A (for example see Figure 2-7 for wells 24SVE35, -35A, and -35B).
- 5) There appear to be errors in the columns of the Hours of Operation and of the On-line Efficiency of Table 2-4 for the 5/25/99 dates.

Please address the above deficiencies.

The Department appreciates the efforts undertaken by the Navy in scheduling conference calls to keep all participants abreast of the status of site remediation.

As before, the Department continues to value the opportunity to comment on the various on-going activities and to work cooperatively towards the eventual cleanup of the site. If you have any questions, please call me at (714) 484-5429. Please note that I will be out of the office from September 15 - 24, 1999. Please contact Mr. Lazslo Saska at (916) 323-3283 if you should have any questions regarding this letter during the time that I am out.

Sincerely,



Alice Gimeno  
Remedial Project Manager  
Office of Military Facilities  
Southern California Operations

cc: See Next Page