



May 30, 1997

Joseph Joyce
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AC/S Environment (1AU)
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Subject: Site 24 Contaminated Soils Cleanup
Soil Vapor Extraction with Carbon Adsorption and Regeneration

Reference: Proposed Plan for Environmental Restoration
MCAS El Toro, dated May 1997

Dear Mr. Joyce:

Thank you for your invitation to comment on the Site 24 soils cleanup project. The purpose of this letter is to request that you provide information to help us better understand the technical basis for the proposed solution.

Below you will find a description of several concerns related to the effectiveness and possible risks associated with the referenced plan.

- Freon is known to be difficult to capture in carbon beds. Freon from the MCAS soils will probably pass through the carbon and into the atmosphere.
- Dioxins and furans are known by-products of the thermal combustion of halogenated chemicals, such as those identified in the MCAS soils. Their formation occurs through these two mechanisms, (1) incomplete combustion, and (2) "de novo synthesis". When carbon (saturated with MCAS halogens) is thermally regenerated by conventional methods, dioxin and furan emissions will probably be released from the Regeneration site due to both mechanisms of formation.
- MEK and other keytone solvents (such as those identified in MCAS soils) are known to result in combustion when they come in contact with carbon. Carbon bed fires due to other causes are not uncommon. If a carbon fire starts in the proposed MCAS adsorption beds, dioxin and furan emissions will probably be released from the MCAS site due to both mechanisms of formation.

What levels of emissions (dioxins, furans, and freons) are anticipated with the proposed carbon adsorption system? What emissions levels (dioxins, furans, and freons) are deemed acceptable?

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Some flameless oxidization systems have been shown to effectively reach levels of complete combustion where dioxin, furan and freon emissions are virtually eliminated. Has the flameless oxidation solution been considered?

Once again, we thank you for this opportunity to comment on your proposal. We look forward to your prompt reply.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bruce Myatt", with a large, stylized flourish extending to the right.

Bruce Myatt