



Research • Service

29 April 1999

To: Mr. Glenn Kistner
Remedial Project Manager
USEPA
75 Hawthorne Street
San Francisco, CA

Fax: 415-744-1916

Project # - El Toro -
re: Site 25 / Agua Chinon Wash / Groundwater Contamination

Dear Mr. Kistner:

The attached document summarizes my observations and my inferences from an intense review of Site 24 and Site 25 Reports. The clear implications are that the Agua Chinon Wash area adjacent to Site 24 should be incorporated into Site 24 and not be permitted for a "no further action". The data should speak for itself.

I request you review the relevant information and determine if there are data gaps that require attention, specifically in the Agua Chinon Wash area adjacent to Building 800 on Site 24.

Respectfully submitted,

Charles R. Bennett Ph. D.

c: Greg Hurley (Community Co-Chair/ El Toro RAB)
Joseph Joyce / DoN
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Significant Site 24 / Site 25 Data Gaps
re: TCE and TPH

I have found that the degree that certain data have been scattered between different site designations and various reports caused key observations and conclusions to be overlooked. I came to this conclusion in reviewing the data contained in the Site 24 Draft Phase II Remedial Investigation, February 1996, a document I have regularly criticized on its scientific demerits since its release. These data led me to review the Site 25 Draft Final Phase II RI/FS Addendum reports of April and January of 1997. too Having gone back to the original data of these two RI's, I am sure that anyone else would find the same data gaps, if they were to search their own versions of their data resources.

Observations from Site 24 Draft Phase II RI/9 Feb 96:

1. (Pg 3-14) Section 3.1.2.7 - On Site 24, Building 800 is an active storage facility of miscellaneous petroleum products, it has stained concrete.
2. (Pg 4-9) Table 4-3 - Hazardous waste is stored near Bldg 800; Soil Gas has shown TCE and PCE; Soil has shown TCE.
3. Figure 4-1 - This shows a Hazardous Waste Storage Area for Bldg 800, which is less than 100 yds from a significant TPH detection in Site 25.

4. Table 4-6 - Soil Gas Analyses (ug/L)

Location	Sample #	depth	TCE	TVH
Site 25 locations				
25SG1	73W2298	57'	-	723
25SG1	73W2293	72'	-	567
25SG2	73W2295	47'	44	ND<50
25SG2	73W2296	47'	46	"Not Applicable"
Site 24 locations				
All				"Not Applicable"

5. Table 4-8 - VOC's in Soil (ug/Kg ?)

25B3	73X005302	10'	TPHD = 22	D means determinations(?)
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