



California Regional Water Quality Control Board

Santa Ana Region



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Secretary for
Environmental
Protection

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MCAS EL TORO
SSIC #5090.3

September 11, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
MCAS El Toro
P. O. Box 51718
Irvine, CA 92619 -1718

COMMENTS ON SUMMARY REPORT, UNDERGROUND STORAGE TANK SITE 655B, MARINE CORPS AIR STATION, EL TORO

Dear Mr. Gould:

We have completed our review of the above-referenced document, dated June 14, 1999, which we received on June 17, 1999. We do not concur with the recommendation for closure of the former UST site, based on the following comments:

1. The soil samples taken do not satisfy the closure requirements as specified in the California Code of Regulations, Title 23, Division 3, Chapter 16, Article 7, Section 2672.d.1:

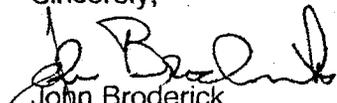
"Soil samples shall be taken immediately beneath the removed portions of the tank, a minimum of two feet into native material at each end of the tank in accordance with section 2649. A separate sample shall be taken for each 20 lineal-feet of trench for piping."

According to the removal report, only one sample was taken from the tank bottom, and no samples were taken from the trench for piping. The recommendation for closure in this summary report is based on the sampling that was done during the removal activities. Based on this limited sampling, the soil characterization in the former tank area is insufficient to warrant closure.

2. An on-site soil stockpile was used to backfill the UST excavation. The sample taken from the soil stockpile (prior to backfilling of the excavation) contained TRPH at 5,940 mg/kg, which is well above the target clean-up level. Because you used this contaminated soil to backfill the excavation, samples should be taken from the former excavation site to characterize the extent of soil contamination.

For any questions on this review or related matters, please call me at (909) 782-4494.

Sincerely,


John Broderick
SLIC/DoD/AGT Section

cc: Ms. Triss Chesney, Department of Toxic Substances Control, OMF
Mr. Gregory F. Hurley, El Toro RAB Co-Chair
Ms. Lynn Hornecker, Naval Facility Engineering Command, SWDIV
Mr. Glenn Kistner, U.S. EPA, Region IX

California Environmental Protection Agency

TRANSMITTAL

Date: 29 September 2000

From: Lynn Marie Hornecker *LMAH*
MCAS El Toro

To: Diane Silva
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MCAS El Toro*

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Note:
UST 655B is located within IRP Site 24.