



Department of Toxic Substances Control



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October 10, 2000

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PROPOSED SAMPLING AT AERIAL PHOTOGRAPH ANOMALY APHO 38, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above document dated March 20, 2000. The document identifies a sampling strategy for APHO 38. APHO 38 was identified by Science Applications International Corporation (SAIC) as SAIC 252 on a 1973 aerial photograph. The anomaly was described as a probable excavation adjacent to Building 1789. The United States Environmental Protection Agency also identified a similar anomaly (EPA 229) on a 1970 aerial photograph, which was described as pits in the same vicinity as SAIC 252.

Currently, three surface impoundments and a vehicle wash rack occupy the APHO 38 area. Based on an as-built drawing for the structures, it appears that they were constructed in approximately 1989. Although the construction and dimensions of the current structures are known, the construction and dimensions of the probable excavation identified as SAIC 252 and EPA 229 are not known.

DTSC understands that the objective of this sampling event is to obtain preliminary information regarding the chemical compounds associated with the site. Additionally, the Department of the Navy plans to perform more extensive sampling in the future. However, after review of the proposed sampling strategy, DTSC has the following comments.

1. The proposed sampling strategy appears to address the existing surface impoundments and vehicle wash rack by proposing preliminary sampling.

However, the strategy should also address the existing aircraft decontamination pads and probable excavation/pits identified in aerial photographs from 1970 and 1973. These issues should be addressed by providing justification for recommending no further action or a description of proposed sampling.

2. To verify that a release did not occur from the existing impoundments, DTSC recommends that soil borings be located within the impoundments. DTSC recommends that two samples be collected from each location, one sample at a depth near the bottom of the impoundment and one sample five feet below the bottom of the impoundment. Additional samples may be required at deeper depth if contamination is discovered.
3. Soil gas samples should be collected from the same depths as the soil matrix samples to evaluate possible correlations between the results.
4. Please provide a reference for the collection of soil gas samples, including the appropriate test method and detection limits. The report should contain a narrative pertaining to the laboratory analyses that includes a description of sampling techniques, decontamination procedures, analytical methods and laboratory procedures, laboratory data quality, and data validation results.

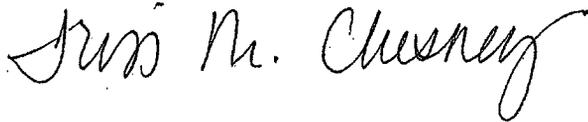
APHO 38 and the adjacent Nuclear, Biological and Chemical Training Defense (NBCD) buildings were recommended for further investigation, including a radiological survey, in the *Final Historical Radiological Assessment* (Roy F. Weston, Inc., May 2000). Based on subsequent conversations with the DON, DTSC contacted the Department of Health Services (DHS) for recommendations regarding radiological analyses of soil samples. The following recommendations are based on information provided by DHS:

1. Prior to performing radiological analyses of soil samples, it is recommended that every effort be made to determine if there is a history of radioactive material use in the area which may have resulted in radiological contamination at depth.
2. If history indicates that radiological contamination may be present at depth, every effort should be made to obtain detailed historical information that might specify isotopes used at the area of concern. Then, contamination at depth will need to be monitored by sample collection.
3. If it is determined that radiological analyses of soil samples is needed, a detailed work plan, including data quality objectives, sampling and analysis plan, etc. should be drafted, reviewed by stakeholders and revised as necessary. The resulting work plan could be used for similar future sampling events.

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If you have any questions, please contact me at (714) 484-5395.

Sincerely,



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Note: APHO 38 is located near IRP Site 25 (storm sewers and surface drainage channels)