



California Regional Water Quality Control Board

Santa Ana Region



Winston H. Hitecox
Secretary for
Environmental
Protection

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Governor

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MCAS EL TORO
SSIC #5090.3

January 24, 2001

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

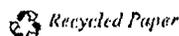
MODIFICATION TO THE SITE 16 PILOT STUDY, FORMER MARINE CORPS AIR STATION, EL TORO

Dear Mr. Gould:

This is in response to your letter of December 6, 2000 proposing modifications to the Site 16 Pilot Study. We concur with your proposal for modification of the pilot study remedial system. However, we have the following comments on this site:

1. We will not agree to the use of a mixing zone within the groundwater as part of the soil gas threshold level calculation. The cleanup standard for groundwater should be applied at the water table. The model should be used to calculate a soil concentration that achieves the cleanup standard without dilution.
2. We believe that it is inappropriate to use monitoring wells as extraction wells. Monitoring wells are designed with an engineered filter to yield representative samples. They are not designed for groundwater extraction efficiency and production capacity. However, in the event that you do proceed with your proposed plan, we request that you drill new groundwater monitoring wells to replace those that are proposed for dedicated use as extraction wells.
3. Based on the information that you provided (in this revision and in prior reports), we believe that previous activities at the site have resulted in significant fuel contamination in the soil. Throughout our work with you on developing this project, we have consistently requested that your pilot study include soil vapor extraction (SVE) from the soil horizon that was identified as the most impacted by fuel contamination. Your plan does not include a proposal to implement our recommendation for SVE at the site. Be advised that we consider this fuel contamination site to be a potential threat to water quality. Therefore, it is likely that, at some point during the CERCLA remedial process, we will require that the fuel contamination at this site be addressed as part of your petroleum corrective action program.

California Environmental Protection Agency



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Mr. Dean Gould

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January 24, 2001

For any questions on this review or related matters, please call me at (909) 782-4498.

Sincerely,



John Broderick
SLIC/DoD/AGT Section

cc: Ms. Nicole Moutoux, U.S. Environmental Protection Agency, Region IX
Ms. Triss Chesney, Department of Toxic Substances Control, OMF
Mr. Gregory F. Hurley, RAB Co-Chair, MCAS El Toro
Ms. Content Arnold, Naval Facility Engineering Command, SWDIV

California Environmental Protection Agency

