ADMIN RECORD

California Regional Water Quality Control Board
Santa Ana Region

Winston H. Hickox
Secretary for Environmental Protection

Internet Address: http://www.swrcb.ca.gov/rwqcb8
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (909) 782-4130 - FAX (909) 781-6288

Gray Davis
Governor

M60050.000759
MCAS EL TORO
SSIC #5090.3

August 14, 2000

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

REVIEW OF FINAL WORK PLAN MPE PILOT STUDY, SITE 16, FORMER MARINE CORPS AIR STATION, EL TORO

Dear Mr. Gould:

We have completed our review of the Final Phase II Work Plan for the MPE Pilot Study, OU-3 IRP Site 16, Crash Crew Training Pit No. 2, dated July 2000, and received at this office on July 31, 2000. You will recall that we provided comments on the draft final report on July 10, 2000, and that we have not fully resolved several pertinent design issues with your representatives. Therefore, we were surprised to receive your final work plan within less than 30 days, and prior to resolving these important issues.

1. The technical issues in question are relevant to the basic design for the pilot study. We believe that the proposed design for the groundwater extraction/soil vapor extraction wells (dual phase) will not enable you to adequately demonstrate the full capability of a dual phase system to remediate the vapor phase at this site. SVE is the most common remedial technology for the removal of volatile organic compounds (VOCs) from the unsaturated zone. Dual phase extraction systems usually target contamination source areas with a dual purpose of increasing the area of vapor extraction into the "saturated zone" (by dewatering a portion of that zone), and also removing contaminants from the extracted groundwater. With the current design, we anticipate that the system will not meet the study objectives, and therefore will not provide the necessary data for full-scale design of the remediation system. In light of these concerns, if the system utilizes the current extraction well design, it is unlikely that we will accept the pilot study findings as valid. Successful pilot systems usually become the core of a final remedy. We believe that the design for the proposed dual phase extraction well will not maximize extraction flow, thereby adversely impacting the remedy.

2. The pilot study work plan does not address the significant mass of total petroleum hydrocarbons (TPH) present at Site 16. Proper application of SVE to soils at the site would clearly result in the removal of some percentage of the total TPH mass. The mass of TPH vapor removed could have a significant impact on an optimal treatment system design. Therefore, the system's capacity to remove and treat TPH should be factored into the design.

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

Sincerely,

John Broderick
SLIC/DoD/AGT Section

cc: Mr. Glenn Kistner, U.S. Environmental Protection Agency, Region IX
Ms. Triss Chesney, Dept. of Toxic Substances Control, Office of Military Facilities
Mr. Gregory F. Hurley, RAB Co-Chair, MCAS El Toro
Ms. Polin Modanlou, MCAS El Toro Master Development Program
Ms. Lynn Hornecker, Southwest Division, Naval Facilities Engineering Command

2000 AUG 17 P 3:47
BRAC OFFICE