

M60050.001308

PETE WILSON, Governor

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

M60050.001308  
MCAS EL TORO  
SSIC # 5090.3



Region 4  
5 West Broadway, Suite 425  
Long Beach, CA 90802-4444  
(310) 590-4868

1995 JAN 23 PM 2:06

January 20, 1994

Mr. Wayne D. Lee  
Assistant Chief of Staff  
Environmental Safety  
U.S. Marine Corps Air Station - El Toro  
P. O. Box 95001  
Santa Ana, California 92709-5001

Dear Mr. Lee:

**REVIEW COMMENTS ON THE DRAFT DATA MANAGEMENT PLAN (DMP) PORTION OF THE PHASE II REMEDIAL INVESTIGATION WORKPLAN**

The Department of Toxic Substances Control (Department) has completed its review of the DMP. The enclosed comments are provided from: the California Regional Water Quality Control Board, Santa Ana Region, the Hazardous Materials Laboratory in conjunction with the California Public Health Foundation and the Department.

Overall this is a well written plan. The general and specific comments are attached. The Department is available to coordinate a phone conference or in person meeting to resolve or clarify these comments.

We look forward to working with you on these and other issues. Feel free to contact me at (310) 590-4919.

Sincerely,

Juan M. Jimenez  
Remedial Project Manager  
Region 4, Base Closure Unit  
Office of Military Facilities

Enclosures

cc: Ms. Bonnie Arthur  
U. S. Environmental Protection Agency  
Region IX  
Hazardous Waste Management Division, H-9-2  
75 Hawthorne Street  
San Francisco, California 94105-3901

WLEE.JJ



Mr. Wayne D. Lee  
January 20, 1995  
Page 2

Mr. Joseph Joyce  
BRAC Environmental Coordinator  
Department of the Navy  
Naval Facilities Engineering Command  
Environmental Division  
1220 Pacific Highway, Room 18  
San Diego, California 92123-5185

Mr. Lawrence Vitale  
Remedial Project Manager  
California Regional Water Quality Control Board  
Santa Ana Region  
2010 Iowa Avenue, Suite 100  
Riverside, California 92507-2409

Mr. Dante J. Tedaldi, Ph.D., P.E.  
Bechtel National, Inc.  
401 West "A" Street, Suite 1000  
San Diego, California 92101-7905

Mr. Andrew Piszkin  
Lead Remedial Project Manager  
Department of the Navy  
Naval Facilities Engineering Command  
Environmental Division  
1220 Pacific Highway, Room 18  
San Diego, California 92123-5185

Mr. David Cowser  
Bechtel National, Inc.  
401 West "A" Street, Suite 1000  
San Diego, California 92101-7905

Mr. Jason Ashman  
Remedial Project Manager  
Department of the Navy  
Naval Facilities Engineering Command  
Environmental Division  
1220 Pacific Highway, Room 18  
San Diego, California 92123-5185

Mr. Wayne D. Lee  
January 20, 1995  
Page 3

Mr. Bart Simmons  
2151 Berkeley Way  
Berkeley, California 94704-1011

## **Draft Data Management Plan for Phase II RI/FS Marine Corps Air Station El Toro**

### **GENERAL COMMENTS:**

1. For all future submittal please use both sides of the sheet.
2. It would help considerably to know how the referenced information can be readily accessed. For example how will the regulators and the public have access to the CLEAN II Program Data Management Plan located at an undisclosed Bechtel National Inc. (BNI) location.
3. Please spell out each acronym the first time it appears in the text.
4. The Hazardous Materials Laboratory and the Regional Water Quality Control Board, Santa Ana Region have provided comments. They are attached.
5. Please enhance the discussion on all the aspects of data transfer between the Navy's CLEAN I and CLEAN II contractors. What has taken place, what is left to do and any successes or problems.
6. Please enhance the sections on the collection of field samples.

### **SPECIFIC COMMENTS:**

1. **Page 4-1, para. 8.** Who decides whether to implement "... (1) double data entry and subsequent file comparisons and (2) rechecking of output documents by both the originator of the data and a second checker." or the minimum? How will this be flagged on the data presented to the Department?
2. **Page 5-2, para. 2.** What level of access will regulators get? Will training and an access code be provided in the near future? Please discuss.

# Memorandum

**To:** Mr. Juan Jimenez **Date:** January 6, 1995  
Department of Toxic Substances Control  
245 West Broadway, Suite 425  
Long Beach, CA 90802

**From:** CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION  
2010 IOWA AVENUE, SUITE 100, RIVERSIDE, CALIFORNIA 92507-2409  
Telephone: CALNET 632-4130 Public (909) 782-4130

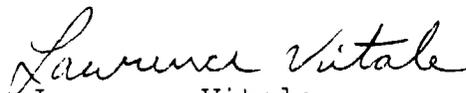
**Subject:** DRAFT DATA MANAGEMENT PLAN FOR PHASE II RI/FS MARINE CORPS  
AIR STATION EL TORO

We have reviewed the subject document, dated 11/4/94 and received by us on 11/21/94. As a result of our review we have the following comments to be included with other CAL/EPA comments:

### 3.2 GEOPHYSICAL DATA, CLEAN II DATA TABLES AND INFORMATION CATEGORIES

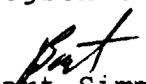
A table for stratigraphy should be included in the list of Table Types. The table will aid in characterizing the sites and enable reviewers to more efficiently evaluate the site geology.

If you have any comments, please call me at (909)782-4998.

  
Lawrence Vitale  
DOD Section

December 29, 1994

Memo to: Juan Jimenez  
Region 3

From:  Bart Simmons  
Hazardous Materials Laboratory

re: Draft Data Management Plan for Phase II RI/FS  
Marine Corps Air Station El Toro

As requested, we have reviewed the draft plan and offer the following comments. The review was done by Danny Mar of the California Public Health Foundation and me. We have reviewed the plan with reference to similar database designs, EPA functional guidelines for data validation, and existing data standards. If you have questions, please call me at 8-571-3112 or PROFs me at BSIMMONS.

In general, the plan describes a good database structure for use in the RI/FS. Following are specific comments.

### Section 3: DATABASE

Table 3-1: Method quantitation limits, sample detection limits, and sample quantitation limits should be added to the database. The reporting limits for a sample may be different than the method reporting limit due to interferences or dilution, and it they should be recorded. Risk assessment may use sample detection limits or quantitation limits for results below the reporting limit.

#### 3.5.2 Field Analysis Data

Commercially available immunoassays are not calibrated with two or more standards as described. This discussion should be revised or eliminated, since it should be covered by the work plan or Quality Assurance Project Plan.

#### 3.5.3 Laboratory Analysis Data

The format of electronic data deliverables should be described. If it does not follow an EPA Contract Laboratory Program (CLP) format or Analytical Instrument Association (AIA) standard, its origin should be explained.

## Section 4: DATA EVALUATION AND VALIDATION

### 4.3 Data Validation and Review

The Naval Facilities Engineering Service Center (NFESC) Level D data QC guidance is referenced, but not supplied. I do not have a copy of this guidance, and it is not referenced in the Data Quality Management of the MCAS El Toro Phase II RI/FS Draft Quality Assurance Project Plan (QAPP), dated 9 November, 1993. Either the Data Management Plan or the QAPP should be revised to be consistent.

Qualification flags for laboratory reporting should be distinguishable from flags for data validation.

Program Procedure (PP) T2.4, Data Review is also referenced but not provided. I do not have a copy of this document. This document should be added as an Appendix or abstracted to show consistency with the QAPP, the NFESC guidance, and the EPA functional guidelines for data validation.

The data review as described in this section implies that data will be qualified based on not only quality control data, but also based on sampling objectives, design, and sample collection. This is a valuable plan, but it may require more qualifiers than those in the EPA functional guidelines. The Data Management Plan should be revised to describe what qualifiers will be used for data with inadequate sampling objectives, sampling design, or sample collection.

cc: Fred Seto