

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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



February 15, 1995

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 SITE WORK/OPERATIONS PLAN, FREE
PRODUCT REMOVAL AT TANK 398 SITE MARINE CORPS AIR STATION EL TORO**

The Department of Toxic Substances Control (Department) has received the enclosed comments from the California Regional Water Quality Control Board, Santa Ana Region on the above referenced plan. They are being forwarded as received.

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

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Mr. Wayne D. Lee
February 15, 1995
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Memorandum

To: Mr. Juan Jimenez **Date:** February 7, 1995
Department of Toxic Substances Control
245 West Broadway, Suite 425
Long Beach, CA 90802-4444

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 SITE WORK/OPERATIONS PLAN, FREE PRODUCT REMOVAL AT TANK
398 SITE, MARINE CORPS AIR STATION EL TORO

We have reviewed the subject report dated January, 1995, received by us on January 13, 1995 and we have the following comments:

GENERAL COMMENT

Since groundwater treatment is being proposed for contaminated groundwater, that may be extracted during the free product removal, we would recommend discharging the treated groundwater under a National Pollution Discharge Elimination System (NPDES) permit. The advantages to obtaining an NPDES permit would be that it could be used for discharges at other sites and would be much less costly than offsite disposal. Another option being considered for disposal of treated groundwater is discharge to the Publicly Owned Treatment Works (POTW, sanitary sewer). POTW discharge would require approval from Orange County, who could deny the request. Reuse is another option that was mentioned in Volume 5, 5.0 Management of Project Generated Waste, this should be the first choice but its not mentioned for Mode 1 or Mode 2 operations options.

VOLUME 2-A

3.0 Functional Description, Page 3

3.1 Site conditions, paragraph 5 states that groundwater flow direction is 73 degrees West with a horizontal hydraulic gradient of approximately 0.008ft/ft. In section 3.0 Tank 398 site background page 3.2, the first paragraph states that, November 8, 1994 water level measurement data indicate an apparent groundwater flow direction of N 45 degrees West with a gradient of approximately 0.015ft/ft.

We suggest determining what the current flow direction and gradient is before using either the site background data or the November 8, 1994 data.

Volume 2A

Scope of Work

1.7.1 Task 1, page 5 Removal of JP-5 From Groundwater

MW 398-10 is erroneously listed as an extraction well, should it actually be MW 398-04?

Volume 4

2.2 Waste Disposal page 2-3

In the first paragraph the third sentence states that treated groundwater will be stored in tanks for reuse or disposal offsite. The reuse option was not previously mentioned as a waste water disposal alternative. If reuse is an option why would offsite disposal be considered?

The second paragraph refers to excavated soil being segregated into hazardous and non-hazardous waste piles. To be in compliance with waste discharge requirements you must have a barrier between the contaminated waste soil piles and the uncontaminated surface soils. The text states that the soil piles will be covered with visqueen, a visqueen barrier could also be used as the barrier between the contaminated soils and the ground.

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

Lawrence Vitale
Lawrence Vitale
DoD Section