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MCAS EL TORO
SSIC # 5090.3

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
245 West Broadway, Suite 360
Long Beach, CA 90802-4444

MEMORANDUM

DRAFT

TO: Juan Jimenez
Office of Military Facilities
Base Closure Unit
245 West Broadway, Suite 425
Long Beach, California 90802

FROM: Geological Support Unit
245 West Broadway, Suite 425
Long Beach, California 90802

DATE: February 23, 1995

SUBJECT: COMMENTS ON ***DRAFT ADDENDUM TO THE RCRA FACILITY ASSESSMENT WORK PLAN, MARINE CORPS AIR STATION EL TORO, SANTA ANA, CALIFORNIA***

INTRODUCTION

As requested, the Geological Support Unit (GSU) of the Department of Toxic Substances Control (DTSC) has reviewed the document entitled ***Draft Addendum to the RCRA Facility Assessment Work Plan, Marine Corps Air Station (MCAS) El Toro, Santa Ana, California,*** *(Addendum)*, dated December 1994. The *Addendum* was prepared by Southwest Division, Naval Facilities Engineering Command (Navy), in conjunction with Bechtel National, Inc. (Bechtel).

Listed below are comments directed to MCAS El Toro and their consultants. Before approval of this document, GSU recommends that the following concerns be addressed.

GENERAL COMMENTS

1. Provide a signature page signed and stamped by a California Registered Geologist or a Professional Civil Engineer at the beginning of all future submittal that include information and interpretation regarding geology, hydrogeology, and vadose zone investigations.

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2. Conduct a general internal review before submittal of any future documents. Reconcile all discrepancies within the Addendum.

3. Provide an Executive Summary. Document the events that led to the Addendum, include an explanation why RCRA terminology is used but technically the Addendum is not a RCRA document. Also explain why the scope of the Addendum has changed from the original Final RCRA RFA (CH2MHill, 1993).

4. In Section 1.4 - Objectives - it is stated "SWMUs and AOCs requiring additional assessment by the DTSC involving storage tanks or oil/water separators will be addressed under different CTOs. Therefore, the activities proposed in the WPA will not address all of the DTSC comments on the RFA report (CH2MHill, 1993) and additional work will be required."

   Provide information regarding the CTO which the storage tanks and oil/water separators will be addressed. Also, provide a list highlighting DTSC comments that were incorporated into the Addendum.

5. In the future, provide all previous DTSC comments and Navy responses or identify the nature and location of changes in the final document. The Addendum does not clearly outline changes from the Final RCRA RFA (CH2MHill, 1993).

6. A SWMU/AOC, or TAA where contamination is verified will be addressed either under the Remedial Investigation/Feasibility Study (RI/FS) program or a removal action program such as an Engineering Evaluation/Cost Analysis (EE/CA).

   Describe the criteria that will be used to determine under what program these SWMU/AOCs and TAAs will be addressed.

7. Section 3.2.3.1 - Geological Investigation and Geotechnical Sampling - Although it is not stated, it is assumed by GSU, that all borings will be logged.

   Notify DTSC if this assumption is incorrect.

8. Temporary Accumulation Areas: Discuss an approach to eliminate the TAAs from the RFA listing, when appropriate. For example, concrete pad TAAs could be decontaminated by bead blasting then the concrete sampled using a wipe test.

   In Section 4.2.1 the sampling method is described "If stains of discolorations observed, a screening sample may be taken by using a steam cleaner or by scrubbing and collecting the resulting fluid to analyze for SVOCs/PCBs/pesticides/metals." This sampling technique is not acceptable.

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Section 3.2.3.4 Opportunity Sampling, describe in more detail the definition of Opportunity Sampling and the field methods for sample collection.

It is strongly suggested that the methods of characterization and determination of No Further Action (NFA) for the TAAs should be further discussed in a technical meeting.

9. Excavations have occurred at SWMU 9 (Fuel Bladder East of Aqua Chinon) and at SWMU 264 (DRMO Storage Yard #3). Re-evaluate sampling locations and depths.

   Provide details of the excavations including the manner in which it was documented.

10. There are about ten additional TAAs in the Addendum as compared to the Final RFA Report (CH2MHill, 1993). Please provide an explanation for this discrepancy.

11. Detection limits for field screening analysis, especially for PCBs, PAHs and SVOCs, must be evaluated by the BCT. There may be an enhanced probability in identifying contamination using screening techniques because of the increased number of samples collected and analyzed. This may outweigh the fact that some of the field screening immunoassay kits can not produce detection limits and/or health-based values achieved by off-site laboratories, however, the BCT should fully understand the limitations of these field techniques and be in agreement regarding this issue.

    An example is the immunoassay kit used for PCBs. The addendum recommends using the immunoassay kit for Arochlor 1260. The immunoassay kit detection limit criteria (0.4 ppm) should not be limited to Arochlor 1260. The detection limits for other Arochlors are higher then 0.4 ppm and the detection of any Arochlor poses a potential problem. Both residential the industrial PRGs are less then the detections limits listed in the Quality Assurance Project Plan (QAPP) (Table 3-1). Because the detections limits are more than the health-based threshold criteria it is recommended that the Navy propose an approach to interpret the non-detect results.

    This subject should be listed as a high priority at a technical meeting because not only are immunoassay kits being proposed for the work resulting from the Addendum but it has been discussed at several RPM meetings that this field technique will be implemented during the RI/FS Phase II field activities.

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12. Section 3.2.4.2 - Off-Site Analysis - This section states that "some or all" of the various suites of constituents will be submitted to off-site laboratories.

Provide an explanation as to the rationale for deciding when "some or all" of the chemical suites will be send to off-site laboratories.

13. Field Sampling Plan (FSP)

A. Section 5, Request for Analysis, Page A5-1, last paragraph - It is stated " Because this FSP covers activities required to close an RFA, rather than CERCLA activities, there will be no submission of off-site analytical samples to the U.S. EPA Contract Laboratory Program (CPL) analytical services". It is recommended that this issue be discussed and agreed upon among the RCT.

B. Ensure that at least one off-site confirmation sample is collected from each SWMU/AOC.

14. QAPP - Provide the comparable PRGs in Table 3-1.

15. All SOPs that are applicable to this investigation should be included in the appropriate companion documents. Please do not include procedures that do not apply to this specific investigation. If it is agreed upon that a SOP master control copy will be supplied to DTSC then it is not necessary to attach the complete description of each SOP to the work plan. However, if it is decided not to include the SOPs in the work plan it is recommended that either the field team leader or the CTO leader sign a document stating that the field technicians have read and understand the appropriated SOPs. This signed document would be included in the final report.

All references pertaining to SOPs should include both the section and page number location within the SOP master control copy.

Any field or laboratory procedures, including any modified procedures, that are not provided in the SOP master copy should be included in the SAP or QAPP.

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Thank you for the opportunity to review and comment on this document. If you have any questions, please contact me at extension 5528.

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Concur: Karen Thomas Baker, CEG
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