

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

Region 4

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 MCAS EL TORO  
 SSIC # 5090.3



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March 6, 1995

Mr. Joseph Joyce  
 BRAC Environmental Coordinator  
 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 reviewed the document referenced above. Overall this is a well written and concise plan. The Department requests that a copy of the progress reports and summary document be provided for our files, as they are generated.

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,

FOR Juan M. Jimenez  
 Remedial Project Manager  
 Base Closure Unit, Region 4  
 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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Ms. Lynn Hornecker  
Remedial Project Manager  
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

Draft Site Work / Operations Plan

Tank 398 Site Free-Product Removal System

General Comments

1. Please provide the following information:
  - o How long was Tank 398 known or suspected to have leaked?
  - o How much JP-5 was lost?
  - o How much of the lost "product" does the Navy/Marines predict has reached the groundwater surface?
  - o How or will the JP-5 in the soils between the floating product and the surface be addressed?
  - o How much JP-5 does the Navy/Marines anticipate will be recovered?
2. Please discuss holding times for soils, water and "product". This is more of a concern if the product is not recycled.
3. There are a number of typographical and grammatical errors which should be corrected prior to the Final version of this report but which will not be addressed in these comments.
4. The use of PVC at depths down to 200 feet may be a problem during extraction. Discuss the possible problems which can be anticipated and the contingency to deal with it, should it become a problem.

Specific Comments

Pg. Para. Line

- 2-1 1 When will the soils associated with Tank 398 be addressed? What agency will set, if any, soil cleanup goals? Will they be based on both groundwater quality or health based?
- 3-1 1 The El Toro Marine Corps Air Station is closer to 4700 acres, not 4000.
- 3-2 2 The last sentence states "Thickness of free product formation could be much less." Please expand on this subject. For example, why could it be much less? Could it be that preferential flow channels exist which have, due to groundwater gradients, allowed the free product to migrate away from the Tank 398 area, rendering the proposed extraction system less than optimal? Could it be more? See next comment.

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Table 3-1 There is a trend in the data provided in Table 3-1, "Apparent Free-Product Thickness" which shows that from 3/16/93 to 11/8/94 the Apparent Thickness increased for 7 of the 9 wells tabulated. Well MW398-10 was not measured due to an obstruction at 161.40 feet. While well MW398-19 decreased. This brings to mind two things: 1) Does the obstruction in MW398-19 affect the usefulness of this well as either a monitoring well or a possible extraction well, etc... and 2) There is very little discussion on why this increase is occurring. Please discuss.

Table 3-2 Why do some wells have a thirty foot screen interval and others have a fifty foot screen interval? How does the screen interval affect the ability of the pumps to skim the JP-5 from the surface of the groundwater?

4-1 Please provide the Department at least one copy of the documents which are going to be produced and can be shared with the public for our perusal and for our files.

4-3 1 See previous comment on well MW398-19. Is it usable? In addition, the text implies that wells MW398-18 and -26 will be definitely used while Volume 2A, page 3, paragraph 7 states that "Pumps may be installed into existing wells MW398-19 and - 26 in the future." Please clarify that this is an option in the text and in the figures in chapter 4.

5-1 1 Provide an update on the status of the Permits delineated in this chapter.

Volume 2A, Navy Letter to OHM

Page 3 Paragraph 3 states that 95 % of the hydrocarbons are JP-5. What constituents make up the other 5 %?

Page 6 It is not clear if there additional pumps available in case the pumps being put down hole have a catastrophic end. Are there replacement pumps or are there replacement parts called out for in the contract?

Page 10 Hydropunch, cone penetrometers may be of limited usefulness at 200 feet below ground surface specially if there are any gravels.