



EPA

Department of
Toxic Substances
Control

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June 24, 1997 /



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MCAS EL TORO
SSIC #5090.3

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Governor

James M. Strock
Secretary for
Environmental
Protection

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
P.O. Box 95001
Santa Ana, California 92709-5001

**COMMENTS ON DRAFT GROUNDWATER REMEDIATION PILOT TEST
WORK PLAN FOR MARINE CORPS AIR STATION (MCAS) EI TORO**

Dear Mr. Joyce:

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated June 1997 prepared by Bechtel National Inc. The Work Plan presents the rationale and methodology for completing groundwater remediation pilot test work at MCAS El Toro.

This letter is to transmit the enclosed DTSC comments on the document. If you have any questions, please call me at (562) 590-4891.

Sincerely,

Tayseer Mahmoud
Remedial Project Manager
Office of Military Facilities
Southern California Operations

Enclosure

cc: Mr. Glenn Kistner, SFD-8-2
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Mr. Joseph Joyce
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DEPARTMENT OF TOXIC SUBSTANCES CONTROL
Comments on
Draft Groundwater Remediation Pilot Test Work Plan
Marine Corps Air Station-El Toro
Dated June 1997

The list of comments below were prepared by Mr. Tayseer Mahmoud, Remedial Project Manager for Department of Toxic Substances Control (DTSC) and Ms. Sherrill Beard, Engineering Geologist from DTSC's Geological Services Unit (GSU). The comments are directed to the Department of Navy and their consultants.

1. Section 2, Figures Showing Groundwater Plumes

The figures show data samples collected September 1992 to February 1993. Are there any recent data that can be plotted on the figures?

2. Section 3, Well Installation, Sampling, and Analysis, page 3-1

The text mentions five extraction and three injection wells will be installed as shown on Figure 3-1. Please list proposed wells. Also, check the figure to ensure that all the wells and their tentative locations are shown.

3. Given the information currently available to GSU, in-well air stripping is not recommended as a remedial technology. GSU encourages conducting pilot test for alternative technologies, however, at MCAS El Toro, site conditions exhibit low hydraulic conductivities and heterogeneous stratigraphy which do not lend to in-well air stripping. Also, data from prior aquifer tests and the air sparging pilot test can be used to show an in-well air stripping pilot test has a low likelihood of success. Furthermore, the United States Environmental Protection Agency (U.S. EPA) staff brought to the attention of the participants of the June 16, 1997 meeting, that a similar pilot test was conducted at Edwards Air Force Base, with similar stratigraphy and higher hydraulic conductivities, which produced inconclusive results and no further interpretation of the data was conducted. However, during the site visit SWDIV informed the agencies that the scheduled addendum work plan outlining the details of the in-well air stripping pilot test would include, standard procedures, a discussion about case studies in similar geologic setting and interpretation of the results. Therefore, currently GSU does not concur with the implementation of an in-well air stripping pilot test, however, after the addendum work plan is submitted and reviewed, the addition information may show this type of pilot testing is applicable at MCAS El Toro, Site 24.

Comments on Draft Groundwater
Remediation Pilot Test Work Plan
MCAS El Toro

4. Currently, the base wide groundwater monitoring program does not use bailers to collect VOC samples. Therefore, to maintain consistency please follow the same groundwater sampling procedures as followed in the base wide groundwater monitoring program.