



Department of Toxic Substances Control



Winston H. Hickox
Secretary for
Environmental
Protection

Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630

Gray Davis
Governor

M60050.002704
MCAS EL TORO
SSIC #5090.3

April 15, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
AC/S, Environmental (1AU), BRAC Building #899
P.O. Box 95001
Santa Ana, California 92709-5001

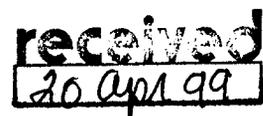
Dear Mr. Joyce:

COMMENTS ON THE TECHNICAL MEMORANDUM PROGRESS REPORT, PHASE I VADOSE ZONE REMEDIATION ACTIVITIES, SITE 24, MARINE CORPS AIR STATION (MCAS) EL TORO

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject report dated March 15, 1999. The progress report describes start-up and testing activities that were conducted during the period from late January 1999 through February 1999.

DTSC Letter dated March 15, 1999 provided comments regarding the contents of the previous *Monthly Progress Report*, dated February 12, 1999. The comments focused on the graphical presentation of soil gas concentration data and on the need to implement a routine program for the monitoring of soil gas extraction parameters. DTSC has received your April 6, 1999, letter in response to DTSC's March 15, 1999, comments.

Your April 6, 1999, letter stated that the ..."*purpose of the monthly progress reports is to present field and laboratory information collected during the start-up, testing and evaluation phase of the remediation activities at Site 24. Also, the progress reports are not intended to evaluate data or draw conclusions, and are not decision documents.*" DTSC agrees with your assessment. However, we are concerned that several of the graphical presentations in the reports compare static and dynamic soil gas concentration measurements to each other and to the remedial action objectives. Because the measurements were collected under various transient or otherwise differing conditions, the measurements' direct comparison is not straightforward. For this reason, DTSC is concerned that displaying such data next to each other and to the RAOs may lead to misinterpretation. To resolve this issue, DTSC feels that a reasonable solution would be to clearly note in the legend section of the appropriate graphic displays that the data displayed represent soil gas concentration measurements some of which were collected under variable or transient subsurface conditions.



Mr. Joseph Joyce
April 15, 1999
Page 2

With regard to the routine monitoring issue, DTSC is pleased to acknowledge that you will begin the routine collection and reporting of soil vapor extraction operational parameters such as concentrations, flow rates, and other relevant parameters. DTSC is looking forward to receiving and jointly evaluating the data with you to assess the remediation progress at Site 24.

DTSC continues to value the opportunity to comment on the various ongoing activities and events that shape the remediation of Site 24, and to work cooperatively towards the eventual cleanup of the site. If you have any questions, please call me at (714) 484-5418.

Sincerely,



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

cc: Mr. Glenn Kistner
Remedial Project Manager
U. S. Environmental Protection Agency
Region IX
Superfund Division (SFD-8-2)
75 Hawthorne Street
San Francisco, California 94105-3901

Ms. Patricia Hannon
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

Mr. Gregory F. Hurley
Restoration Advisory Board Co-chair
620 Newport Center Drive, Suite 450
Newport Beach, California 92660-8019

Ms. Polin Modanlou
MCAS El Toro Local Redevelopment Authority
10 Civic Center Plaza, 2nd Floor
Santa Ana, California 92703

Mr. Joseph Joyce
April 15, 1999
Page 3

cc: Mr. Laszlo Saska
Department of Toxic Substances Control
Engineering Services Unit, HQ-29
P.O. Box 806
Sacramento, California 95812-0806

Mr. Dave B. DeMars
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division - Code 5BME.DD
1220 Pacific Highway
San Diego, California 92132-5187

Mr. Crispin Wanyoike
Earth tech, Inc.
100 West Broadway, Suite 5000
Long Beach, California 90802