



# Department of Toxic Substances Control



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MCAS EL TORO  
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Gray Davis  
Governor

July 10, 2001

Mr. Dean Gould  
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ADDITIONAL COMMENTS ON THE ADDENDUM TO THE FINAL SUPPLEMENTAL  
WORK PLAN, CLOSURE OF VARIOUS TEMPORARY ACCUMULATION AREAS AND  
RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) FACILITY  
ASSESSMENT SITES, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

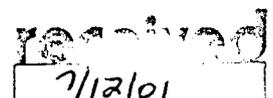
The Department of Toxic Substances Control (DTSC) reviewed the subject addendum dated January 17, 2001. DTSC comments on the document were submitted on July 3, 2001; this letter supplements those comments.

According to the document, this addendum presents changes to the *Final Supplemental Work Plan, Closure of Various Temporary Accumulation Areas and RCRA Facility Assessment Sites (FSWP)*, prepared by OHM Remediation Services Corporation, dated September 26, 1997.

DTSC has the following additional comments:

1. Section 6, Sampling Strategy and Rationale: According to the list of sampling activities to be conducted at the temporary accumulation area (TAA) sites, "If (based on visual inspection) there are no significant cracks or stains on the surface of the concrete pad, a soil sample will not be collected from beneath the surface of the concrete pad. If there are significant cracks and heavy stains on the surface of the pad, additional soil samples will be collected beneath the cracks . . ."

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*



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In the previous work plan, samples were collected beneath sumps at Type 1 facilities and beneath low points or cracks in the pad at Type 2, 3 and 4 facilities. The purpose of the investigation is to evaluate if a release has occurred at a TAA to the pad or underlying soils. The condition of the current pad may not be cracked or stained; however, the pad may have been historically repaired or reconstructed over another pad whose condition is unknown or over an area that was used as a TAA on bare soil. Collection of samples beneath the pad would provide additional information at depth and would indicate if an underlying release is present.

The proposed sampling strategy is a departure from the previous strategy. Please provide justification for changing the strategy. This justification may include a correlation based on previous investigations of similar TAAs. For example, demonstrate a correlation between the absence of significant cracks/staining and associated analytical results of samples collected beneath the pad that did not indicate a release.

2. Section 6, Sampling Strategy and Rationale, Table 6-1, Soil Sample Locations for Each TAA Type: According to the table, for Type 1 TAAs, samples will be collected underneath the sump, but only if cracks, discoloration, or stains are apparent.

For Type 1 TAAs, samples should be collected beneath each sump to investigate potential releases regardless of whether cracks, discoloration or stains are apparent. Sumps are typically constructed with joints in the construction material which are potential release mechanisms.

If you have any questions, please contact me at (714) 484-5395.

Sincerely,



Triss M. Chesney, P.E.  
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cc: See next page

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