

Arnold Schwarzenegger



California Regional Water Quality Control Board Santa Ana Region



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Arnold Schwarzenegger
Governor

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SSIC NO. 5090.3.A

Linda S. Adams
Secretary for
Environmental Protection

August 31, 2007

Base Realignment and Closure
Attn: Mr. Richard C. Weissenborn, P.E.
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, California 92618

**Comments on Draft Field Change Justification No. 1, IRP-16 Confirmation Borings
Former Marine Corps Air Station, El Toro
Geotracker No. DOD1090168600**

Dear Mr. Weissenborn:

We have reviewed the above referenced document, dated March 26, 2007, which we received electronically on August 7, 2007. This work plan identifies five tasks:

- Pre-drilling activities
- Confirmation borings and sample collection methods
- Laboratory analysis
- Vadose Zone Modeling
- Reporting

We have the following comments:

- **Task 2: Confirmation Borings, Headspace Analysis, Page 2:** Soil contaminant screening is proposed, utilizing immunoassay tests and photo ionization detectors (PID). Please be aware that PIDs will not detect all contaminants associated with a petroleum fuel release site. Additionally, the intensity of energy emitted by the source or bulb, along with other factors, affects the ability of these instruments to detect various specific organic compounds. Please include a section in this work plan discussing the appropriateness of selection of a PID over other appropriate field instruments such as a flame ionization detector (FID), with respect to detection of the contaminants of concern that have been detected previously at this UST release site. Please re-evaluate the applicability selection of photo ionization detector in field screening analysis for petroleum hydrocarbon contaminants of concern.

With the above comments, the work plan is hereby approved. For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,

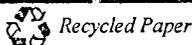
John Broderick

Site Cleanup Program/DoD Section

cc via email only:

James Callian, BRAC PMO WEST
Content Arnold, BRAC PMO WEST

California Environmental Protection Agency



received
9/3/07