

Department of Toxic Substances Control

M60050_004130
MCAS EL TORO
SSIC NO. 5090.3.A



Pete Wilson
Governor

Jesse R. Huff, Director
5796 Corporate Avenue
Cypress, California 90630



Peter M. Rooney
Secretary for
Environmental
Protection

September 8, 1998

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. Joyce:

COMMENTS ON DRAFT FIELD SAMPLING PLAN (FSP) AND QUALITY ASSURANCE PROJECT PLAN (QAPP) FOR GROUNDWATER MONITORING OF PERCHLORATE AT MARINE CORPS AIR STATION (MCAS) EI TORO

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject documents dated August 27, 1998. The FSP provides an overview of field sampling procedures and data gathering methods that will be used to conduct a single perchlorate groundwater sampling event at 50 monitoring wells/ports. The QAPP assures that the data collected are precise, accurate, representative, complete, and comparable to actual site conditions and that the data meet the criteria of technical project procedures during sample collection, sample analysis, and data evaluation.

DTSC comments are as follows:

- FSP, Section 2.2.2 Recent Base Operations:** Delete reference to the on-Station RCRA Interim-Status Storage Facility because El Toro has closed the RCRA storage facility and DTSC accepted the closure certification in March 1996. Currently, hazardous materials/wastes are managed under appropriate Federal, State, Local, and DoN requirements.
- FSP, Section 6.8.1 Groundwater:** According to the FSP, groundwater produced during purging and sampling will be stored and treated at the waste staging area treatment system (granular-activated carbon). Please verify whether or not this treatment technology is effective for the destruction of Perchlorate in the groundwater. Have there been any studies to support this premise?



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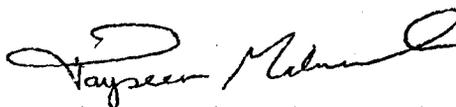
3. **FSP, Section 5.3 Quality Control:** Page 5-2 listed the field quality control samples. It may be useful for field quality control samples to include split samples. We recommend a split sample collection frequency of 5 percent to 10 percent with a minimum of one per sampling event. The split samples should be analyzed by different certified labs per analytical method, Determination of Perchlorate by Ion Chromatography, Revision 0.0, Sanitation and Radiation Laboratory Branch, DHS, State of California, June 3, 1997. The analysis results of the split samples from different labs should provide valuable verification information.

I would like to point out that DTSC will be taking split samples in support of the perchlorate study. Please send us the field sampling schedule for each proposed sampling location two weeks before the sampling takes place.

4. **Quality Assurance Project Plan:** The QAPP for groundwater monitoring of perchlorate has substantially complied with pertinent elements of the EPA requirements for Quality Assurance Project Plans for Environmental Data Operations, EPA QA/R-5, Draft Final, July 1993. The analytical method and the quality controls are consistent with the project's data quality objectives with respect to items such as accuracy, precision, and detection limits (detection limits should be 4 μ /l).

If you have any questions, please call me at (714) 485-5418.

Sincerely,



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

cc: Mr. Glenn Kistner
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