



Department of Toxic Substances Control



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March 28, 2008

Marine Corps Air Station El Toro
Base Realignment and Closure
Attn: Ms. Debra Theroux
Deputy Base Closure Manager
7040 Trabuco Road
Irvine, California 92618

COMMENTS ON THE DRAFT POTENTIAL RELEASE LOCATION (PRLs) SITE INSPECTION (SI) WORK PLAN, FORMER MARINE CORPS AIR STATION (MCAS) EL TORO, IRVINE, CALIFORNIA

Dear Ms. Theroux:

The California Department of Toxic Substances Control (DTSC) has reviewed the subject Work Plan dated February 2008. The Work Plan documents the planned site inspection at six PRLs, which are PRLs 296, 297, 354, 605, 606, and Runway Infield Area (RIA). The major activities in this SI include review of available records, visual site inspections, and soil sampling to assess if releases of hazardous substances have occurred at the PRLs.

After reviewing the Work Plan, DTSC has the following comments:

1. Unless there are physical limitations, DTSC requests that step-out locations be aligned such that they adequately cover the location of a "hot" sample. For example, it appears that the step-out locations for HA1 and HA11 at PRL 297, as depicted in Figure 2 of Appendix B, do not provide coverage on the west side. Please also see Comment No. 8.
2. Because the February 3, 2006 letter from DTSC is referenced repeatedly in the Work Plan, please append it to the document and reference it in the text where necessary.
3. PRL RIA: DTSC understands that the runway demolition contractor left the project prematurely. In the discussion of soil removal associated with runway demolition, please indicate if soil removal did take place at the RIA PRL.

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4. The "E" in PERF stands for "Environmental", not "Evaluation". Please correct wherever necessary, e.g., at the bottom of the Table of Contents, in the List of Acronyms, and page 1-11, etc.
5. Page 1-6, PRL 297 is located in building 297, not 296.
6. Table 2-1, page 2-5, PRL 296: The depth of sample HA2 should be listed as 15', as shown in Table A3-1 and Figure 1 in Appendix B.
7. Table 2-1, PRL 297: The depths of samples HA15, 16, and 17 are listed as 5' and 10' in the Table but as 4' and 10' in Figure 2 in Appendix B.
8. Figure 2, Appendix B, PRL 297: DTSC requests that a deep sample in the HA13 area be taken to serve as a step-out to HA11 unless one of the three step-outs can be re-located to the west side of HA11.
9. Table A4-2, Appendix A: Project Action Limit for Arsenic should be background value.
10. Page A-xv: The phone number of the DTSC RPM is (714) 484-5352.

Thank you for the opportunity to review and comment on the Work Plan. Please provide the responses to these comments at your earliest convenience. If you have questions about this letter, please contact me at (714) 484-5352 or qthan@dtsc.ca.gov.

Sincerely,



Quang Than
Remedial Project Manager
Office of Military Facilities
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cc: Content Arnold
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SENSITIVE RECORD

PORTIONS OF THIS RECORD ARE CONSIDERED SENSITIVE
AND ARE NOT AVAILABLE FOR PUBLIC VIEWING

ADDRESS OF PRIVATE CITIZEN

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