



ENVIRONMENTAL MANAGEMENT AGENCY  
REGULATION

FILE

Capt. J. R. Faunce  
Director, Facilities Mgmt. Dept.  
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Marine Corps Air Station  
El Toro, (Santa Ana) CA 92709-5001

**SUBJECT:** Review of Draft Site Sampling and Analysis Plan - CTO  
#0018Pla: Comprehensive Work Plan for Remedial  
Investigation/Feasibility Study at the Marine Corps Air  
Station El Toro

Dear Capt. Faunce:

One of the main objectives of the Sampling and Analysis Plan is to provide sufficient data to determine if MCAS operations have contaminated agricultural wells to the west of the base. Unless the plan is modified to incorporate additional data collection and analysis, the plan is unlikely to meet this objective. Specific areas of concern are:

1. The histories for sites 7, 9, and 14 detail the procedures that have caused the contamination, the nature of the materials involved, and estimates of the quantities of materials that have been disposed at these locations. This information is in marked contrast to the descriptions provided for the sites where solvents may have been dumped. No information is provided for sites 1, 2, and 5 other than the possibility of each of these sites being a potential VOC source area.

If MCAS El Toro has failed, since 1943, to maintain any solvent inventory control, this omission needs to be stated in the SAP. Otherwise an estimate needs to be included in the SAP, possibly based on extrapolation of the quantities used during the late 1970's, of the volume of spent solvents landfilled or used for dust suppression since the base's inception as an air station.

2. One purpose of the new wells, to be installed as part of the Regional VOC Study, is to provide horizontal and vertical aquifer coverage near the base boundary. Data from these wells may clarify the relationship, if any, between the shallow groundwater contamination identified by JMM (1988) and the deep

Capt. Faunce  
Page Two

aquifer contamination reported by OCWD. This important aspect of the investigation, however, neglects sites 2, 3, and 5. Unless additional intermediate depth wells, down gradient of these sites are installed, the SAP may fail to determine if MCAS operations have caused contamination of local agricultural wells west of the base: a prime objective of the SAP (p.2).

3. The Perimeter Investigation Plan of Action (1987) identified four historic solvent disposal areas and thirteen solvent use areas as potential sources of groundwater contamination. This Plan of Action also recognized that TCE/PCE may have also been used or stored at other locations. Currently the SAP only identifies the disposal areas, noting on p.136 that other sites may have also contributed to the regional VOC contamination. The additional information in the Plan of Action needs to be incorporated into the SAP and the investigation expanded to address the potential VOC migration pathways from these locations.

Please direct questions to Richard Boon at (714) 567-6372.

Sincerely,



D. R. Collacott, Manager  
Environmental Resources Division

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