

Transmittal

Date: 15 November 2004

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To: **Frank Cheng**
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Tayseer Mahmoud
State of California Environmental Protection Agency
Department of Toxic Substances Control (DTSC), Region 4
Site Mitigation Branch, Base Closure Unit
5796 Corporate Avenue
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Subj: Work Plan
Former Temporary Accumulation Areas
Former Marine Corps Air Station, El Toro

Transmitted are Navy responses to DTSC comments dated 22 September 2004 and replacement pages that incorporate the comments for the Work Plan for assessments at several Former Temporary Accumulation Areas (TAAs) at the Former Marine Corps Air Station, El Toro.

Please insert the replacement pages in the Work Plan if you concur with the responses to comments and the revised pages. Please provide comments or concurrence within 60 days of receipt, if possible. If additional time is required for the review, please contact Mr. Andy Piszkin (E-mail: Frank.Piszkin@Navy.mil) to establish a schedule for the completion of the review.

Please do not hesitate to contact me at (619) 532-0783 if you have questions pertaining to this project.

Thank you very much.

Attachment

Responses to comments and replacement pages for Work Plan (CDM 2004)

Copy to:

Andy Piszkin
BRAC Environmental Coordinator
Base Realignment and Closure
Marine Corps Air Station, El Toro
7040 Trabuco Road
Irvine, California 92618

CSO El Toro

Project File (MCAS El Toro)

Response to Comments

Work Plan for Site Assessments at Temporary Accumulation Areas 2, 51, 115, 297, 388 A, 388 B, 634, 671, 672, and Solid Waste Management Units 43 and 89, Former Marine Corps Air Station El Toro, El Toro, California

The following is a response to comments provided by Mr. Tayseer Mahmoud of DTSC on 01 October 2004:

#	REFERENCE	COMMENT	RESPONSE
1	General Comment 1	Hand augering may not be the best method to recover soil matrix samples for analysis of VOCs and TPHg. Direct-push sampling should be used in all practicable locations and any hand auger sampling should be carried out by means of a slide-hammer sampler equipped with stainless steel or brass sample rings.	Since the samples to be collected are at fairly shallow depths, hand augering will be utilized for sampling. Samples for VOCs and TPHg will be collected by means of a slide-hammer sampler equipped with stainless steel or brass sample rings.
2	General Comment 2	The volume of soil matrix recovered may be small in comparison to the soil volumes needed for the proposed suite of analyses. Please confirm the needed soil volumes and sample containers with the laboratory. The revised SAP should specify the diameter and type of soil sampler, number of containers, and type of sample containers required for each soil matrix sampling point. The SAP should also demonstrate that the volume of soil recovered in the field at each proposed sample point will be reasonably sufficient for all sample containers and sample analysis.	Please refer to Table D.8-1 for number, volume of soil, and type of containers utilized for each proposed analytical method. The volumes of soil required were verified with the analytical laboratory and it was concluded that the volume of soil collected will be sufficient for the proposed analytical methods.
3	General Comment 3	The SAP should be modified to include revisions for using EPA Method 5035 sampling both for VOCs and TPHg.	The analytical lab will be asked to change the prep method for VOCs and TPHg to EPA Method 5035 and this change has been made to Table D.4-1 of the SAP.
4	General Comment 4	The VOC analysis should include the common fuel oxygenates tert-amyl methyl ether (TAME), diisopropyl ether (DIPE), ethyl tert-butyl ether (ETBE), tert-amyl alcohol (TAA), and tert-butyl alcohol (TBA), in addition to MTBE.	VOC analysis will include MTBE and common fuel oxygenates mentioned. This change has been incorporated in the SAP.

Response to Comments

Work Plan for Site Assessments at Temporary Accumulation Areas 2, 51, 115, 297, 388 A, 388 B, 634, 671, 672, and Solid Waste Management Units 43 and 89, Former Marine Corps Air Station El Toro, El Toro, California

#	REFERENCE	COMMENT	RESPONSE
5	General Comment 5	Please follow the DTSC guidance for screening with Preliminary Remediation Goals.	Comment noted.
5	TAA 297, Comment 9	The vertical and lateral extent of PAH, SVOC, pesticide, and arsenic contamination has not been characterized in the vicinity of SWMU 73. The deepest sampling for these contaminants was apparently 3 feet bgs, and the lateral extent of contamination has not been determined. Additional borings and sampling are needed to characterize this area. Also, since PAHs are a significant concern in this location, the SAP should include soil matrix analysis by EPA Method 8310 in the laboratory testing.	The number of soil borings proposed for TAA 297 has been increased to ten from seven to better characterize the area associated with the various SWMUs constituting TAA 297. Previous investigations have found contamination above residential PRGs related to toxaphene, dieldrin (pesticides), several SVOCs, however, no PAHs have been detected above residential PRGs at TAA 297/SWMU 73. Therefore, soil samples will not be analyzed for PAHs. Also major PAHs are covered under the SVOC suite of analyses

Remaining comments have been incorporated into the documents directly. Replacement pages have been provided for the text affected by these changes.

WORK PLAN
FOR SITE ASSESSMENTS AT TEMPORARY ACCUMULATION
AREAS 2, 51, 115, 297, 388 A, 388 B, 634, 671, 672, AND
SOLID WASTE MANAGEMENT UNITS 43 AND 89

DATED 30 JUNE 2004

THIS RECORD IS ENTERED IN THE DATABASE AND FILED
AS

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