



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CALIFORNIA 92132-5190

M60050.000152
MCAS EL TORO
SSIC # 5090.3

5090
1811.JC:1035E
Ser 000345

NOV 07 1989

Jennifer Goodell, Project Engineer
James M. Montgomery
Consulting Engineers, Inc.
501 Lennon Lane, Suite 200
Walnut Creek, CA 94598

Subject: Contract N68711-85-C-5592

We have reviewed the draft Site Inspection (SI) Plan of Action Addendum for the three additional sites at Marine Corps Air Stations El Toro and Tustin. Enclosed is a list of comments to be incorporated when preparing the final draft version.

If you have any questions, please contact Walter Sandza, (619) 532-2449 (AUTOVON 522-2449).

Sincerely,

ALAN B. FREEMAN
Director, Environmental Division
By direction of the Commanding Officer

Encl:
(1) Comments to SI Plan of Action Addendum

Copy to:
Commanding General
Marine Corps Air Station, El Toro
Santa Ana, CA 92709
Commanding General
Marine Corps Air Station
Tustin, Ca 92710-5001

Blind copy to:
18
181
1811
(18 Activity)
(18 Chron)

Writer: J.Cortez, 1811.JC, X22448
Typist: M. Meehan, 181S, 7 Nov 89

11/1
1
18
Se
18
mm
18
Se
18
Se
18/19

COMMENTS ON THE
SITE INSPECTION PLAN OF ACTION ADDENDUM

A. General comments:

1. What is the justification for the percentages used to calculate the number of field duplicates, matrix spikes, matrix spike duplicates and unspiked duplicates, rinsate blank samples, and VOA trip blanks in the QA/QC Summaries (Tables 3-2 and 3-3)? Specify the reference(s) used in the legend of these tables.

2. The additional sites at MCASs El Toro and Tustin should be incorporated in Table 4-3, MCASs El Toro and Tustin Verification Step Project Schedule.

3. A flame ionization detector (FID) should be used in place of an HNU meter when field screening all soil samples. All field screening data must be provided in the Site Inspection (SI) Report.

4. Background samples should be obtained from uncontaminated areas located outside the area of influence of the individual Installation Restoration (IR) sites.

5. Tables 3-4 and 3-5 lists the types of groundwater, soil and sediment analyses to be conducted. The following is a list of analyses that should be performed on all samples in the Site Inspection phase. This list should be incorporated in the SI Plan of Action:

a. Priority Pollutant Scan, with modified metals list

1. Method 8080, Chlorinated Pesticides and PCBs
2. Method 8240, VOA
3. Method 8270, BNA
4. Cyanide
5. Total Phenols
6. California Code of Regulations (CCR) Metals (specified)

b. Method 418.1, Total Petroleum Hydrocarbons

c. Method 8015 (modified), Non-Halogenated VOCs

d. Organic Lead

6. For some groundwater samples, the Hydropunch method is used in lieu of monitoring wells. Cite specific reasons in each case for using this method. How will sample collection via this method affect the quality of the groundwater sample? What are the advantages of the Hydropunch method over installation of monitoring wells?

B. Specific comments:

1. Section 2.2.14 - Site 4: Ferrocene Spill Area, MCAS El Toro

a. According to the Plan of Action, four monitoring wells from Site 3 will be used as upgradient/background monitoring wells for Site 4. A map delineating exact locations of these four wells with respect to Site 4 should be provided.

b. Paragraph 3 should read "Section 3.5.4" and not "Section 3.4.5".

c. Paragraph 3 states that a minimum of one soil sample will be collected at 10-foot intervals during drilling of the monitoring well. Recommend that soil samples be collected and analyzed one and five feet below ground surface, and also at the first clay encountered. Soil samples should be collected and field screened at 10-foot intervals thereafter and/or at lithologic changes.

d. Table 3-2, Summary of Soil and Sediment QA/QC Analyses, lists a total of three soil and sediment samples for Site 4. However, paragraphs 3 and 4 state that a minimum of one soil sample will be collected during drilling of the monitoring well, three sediment samples collected in the drainage ditch and catch basin, and one shallow soil sample collected near the drainage ditch. This would require a total of five soil and sediment samples at minimum. This would also have an effect on Tables 3-4 and 4-1.

2. Section 2.2.15 - Site 19: ACER Site, MCAS El Toro

a. A lead analysis is proposed for six soil boring samples collected at depths of 5 and 15 feet. Additional samples should be taken at 1 and 10 feet below the ground surface, and at the first clay encountered. The first clay sample may be substituted for the 1, 5, 10 or 15-foot sample if it is in close proximity of any of these depths.

b. Table 3-5, Breakdown of Groundwater Analyses, lists the total number of samples for each of the analyses to be conducted for Site 19. The numbers from this table for Site 19 contradict what is stated in para 10 and Table 3-3, Summary of Groundwater QA/QC Analyses.

3. Section 2.3.9 - Site 8: Drainage No. 2, MCAS Tustin

a. No specific comments