



Department of Toxic Substances Control



Winston H. Hickox
Secretary for
Environmental
Protection

Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630

Gray Davis
Governor

February 1, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
BRAC Operations Office
1220 Pacific Highway
San Diego, California 92132-5190

COMMENTS ON THE IMPLEMENTATION STRATEGY, DEMONSTRATION OF TCE OXIDATION USING POTASSIUM PERMANGANATE, IRP SITE 24, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) has completed the review of the above Implementation Strategy (Report), dated December 1999. The Report describes the proposed potassium permanganate (KMnO_4) based in-situ oxidation of trichloroethene (TCE) in the groundwater.

DTSC is in support of the implementation of the KMnO_4 in-situ demonstration. The only comment we would like to offer for your consideration centers on the construction of the monitoring wells. The strategy proposes to employ dual-nested wells to monitor approximately 60 vertical feet of the subsurface. Each completion would require a screen length of 25 to 35 feet. Because the subsurface lithology is quite variable, as the Report states, we would prefer to see shorter screen lengths for each completion. Thus, we recommend triple-nested (or better) monitoring wells. Shorter screen lengths will provide a more accurate picture of the movement of groundwater and of the effectiveness of the oxidation process.

Mr. Dean Gould
February 1, 2000
Page 2

As before, we value the opportunity to review and comment on the various on-going activities, and to work cooperatively towards the eventual cleanup of the site. If you have any questions, please call me at (714) 484-5395.

Sincerely,



Triss M. Chesney, P.E.
Remedial Project Manager
Southern California Branch
Office of Military Facilities

cc: Mr. Glenn Kistner
Remedial Project Manager
U. S. Environmental Protection Agency
Region IX
Superfund Division (SFD-8-2)
75 Hawthorne Street
San Francisco, California 94105-3901

Ms. Patricia Hannon
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

Mr. Gregory F. Hurley
Restoration Advisory Board Co-chair
620 Newport Center Drive, Suite 450
Newport Beach, California 92660-8019

Ms. Polin Modanlou
MCAS El Toro Local Redevelopment Authority
10 Civic Center Plaza, 2nd Floor
Santa Ana, California 92703

Mr. Dean Gould
February 1, 2000
Page 3

cc: Mr. Laszlo Saska
Department of Toxic Substances Control
Engineering Services Unit, HQ-29
P.O. Box 806
Sacramento, California 95812-0806

Ms. Lynn Hornecker
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division - Code 5BME.LH
1220 Pacific Highway
San Diego, California 92132-5187

Mr. Crispin Wanyoike
Earth Tech, Inc.
100 West Broadway, Suite 5000
Long Beach, California 90802

2 Copies

TRANSMITTAL

Date: 7 February 2000

From: Lynn Marie Hornecker *L.M.H.*
MCAS El Toro

To: Diane Silva
Code 01LS.DS

Subj: CERCLA Administrative Record Materials
Marine Corps Air Station, El Toro

Installation: Marine Corps Air Station, El Toro

UIC Number: M60050

Document Title (or subject): Comments on the Implementation Strategy,
Demonstration of TCE ~~at~~ Oxidation using
Author: TRISS Chesney Potassium Permanganate, IRP Site 24
DTSC

Recipient: Dean Gould, SWDN

Record Date: 1 February 2000

Approximate Number of Pages: 3

EPA Category: 01.1

Sites: IRP Site 24

Key Words: GW, TCE, Demonstration Project

Contract: N/A

CTO Number: N/A

M60050.000279
MCAS EL TORO
SSIC #5090.3

THE STRATEGY DOCUMENT IS ENTERED
INTO THE DATABASE AND FILED UNDER
ADMINISTRATIVE RECORD NO.

M60050.000270

LETTER SENT TO VARIOUS AGENCIES
TRANSMITTING THE STRATEGY DOCUMENT
IS ENTERED INTO THE DATABASE AND
FILED UNDER ADMINISTRATIVE RECORD

NO. M60050.000272