



Department of Toxic Substances Control



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January 27, 2000

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COMMENTS ON TWO (2) PROGRESS REPORTS (NOVEMBER AND DECEMBER),
VADOSE ZONE REMEDIATION VOLATILE ORGANIC COMPOUND SOURCE AREA,
INSTALLATION RESTORATION PROGRAM (IRP) SITE 24, MARINE CORPS AIR
STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) completed the review of the above subject reports (Progress Reports), dated November 1999 and December 1999. The Progress Reports describe the remediation activities of the soil vapor extraction (SVE) system through the end of October 1999, and November 1999, respectively.

DTSC is pleased to acknowledge that the remediation activities are progressing well. We are looking forward to receiving the results of the PneuLog well investigation as well as the details on the installations of the new SVE wells.

We also want to call your close attention to what may be signs of reaching the limit of the adsorptive capacity of the activated carbon vessels. As shown in Table 2-2 and 2-3 on pages 2-26 and 2-27, respectively, of the November Progress Report, the exit concentration of freon-113 from both activated carbon vessels is increasing at an apparently accelerating fashion. Surprisingly, trichloroethene (TCE, also referenced as trichloroethylene) which generally exhibits lower adsorptive affinity than does freon-113 does not show increasing effluent levels at this time. Perhaps the increasing freon-113 emission rate is the result of a combination of factors arising from exhausted activated

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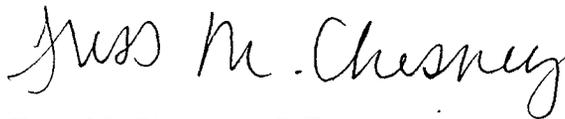
carbon, competition between adsorbed species, and desorption of adsorbed species due to reduced influent concentrations.

Whatever the specific reason may be for this phenomenon, please note that 26 µg/liter of freon-113 exhausted with a 700-standard cubic foot per minute throughput puts over 1.6 pounds per day of freon-113 into the atmosphere. We are not familiar with the specifics of the air emissions permit issued by the South Coast Air Quality management District for the central treatment system, but we would like to confirm that such elevated emission levels continue to remain within prescribed limits.

If current emissions are no longer within the limits, please take immediate steps to replace the existing carbon charge with fresh ones to reduce air emissions from the central treatment facility.

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,



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DTSC

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