



## Department of Toxic Substances Control

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



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Gray Davis  
Governor

May 3, 2000

Mr. Dean Gould  
BRAC Environmental Coordinator  
Marine Corps Air Station El Toro  
Base Realignment and Closure  
P.O. Box 51718  
Irvine, California 92619-1718

### DRAFT PROPOSED PLAN FOR OPERABLE UNIT (OU) 1 INSTALLATION RESTORATION PROGRAM (IRP) SITE 18 AND OU-2A IRP SITE 24, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above-referenced document dated April 2000 and received by this office on April 3, 2000. The draft Proposed Plan (PP) described the alternatives for cleanup of contaminated groundwater at OU 1 IRP Site 18 (Regional Groundwater Plume) and OU 2A IRP Site 24 (Volatile Organic Compound (VOC) Source Area) at MCAS El Toro. The PP identified Alternative 8A for remediation of the principal aquifer at IRP Site 18 and Alternative 10B for remediation of the shallow groundwater unit at IRP Site 24. Along with the preferred remedy for groundwater, soil vapor extraction has been used to remediate soil at IRP Site 24.

After review of the draft PP, DTSC has the following comments:

1. Page 1, third paragraph, last sentence: This sentence states, "TCE [trichloroethene] is no longer used at the Station."

Please clarify the time frame for discontinuing use of TCE at the Station. For example, the base was closed on July 2, 1999 and is no longer in operation.

2. Page 1, Public Comment Period: Please add a statement that written responses to comments received will be recorded in a Record of Decision and refer the reader to page 19.

 Printed on Recycled Paper

**received**  
9 May 00

Mr. Dean Gould  
May 3, 2000  
Page 2

3. Page 3, Figure 1 - Site Location Map: For clarification, please provide a call-out for the TCE plume in the regional groundwater (principal aquifer) and the shallow groundwater unit.
4. Page 3, Figure 1 - Site Location Map: The heading, "TCE Concentrations in Regional Groundwater" contradicts the concentration ranges listed below the heading, two refer to the principal aquifer and one refers to the shallow groundwater unit. Additionally, the lightest color that indicates TCE concentrations "from 5 ppb [parts per billion] to 20 ppb (principal aquifer)" is used on the figure for plumes in both the principal aquifer and the shallow groundwater unit. Providing a call-out suggested in Comment No. 4 will allow one set of TCE concentration ranges to be used for both the principal aquifer and shallow groundwater unit. This may help simplify the presentation.
5. Page 7, Glossary of Terms: Please add descriptions for the Ecological Risk Assessment, Hazard Index and Human Health Risk Assessment. It may also be useful to clarify that a Human Health Risk Assessment is not a health study.
6. Page 7, Glossary of Terms: The term, "Trichloroethylene (TCE)" is listed.

Please include synonyms such as trichloroethene for reference. Additionally, please use one term (trichloroethylene or trichloroethene) consistently throughout the document.

7. Page 14, Cleanup of VOC-Contaminated Soil at Site 24, second paragraph, first sentence: This sentence states, "SVE [Soil Vapor Extraction] is a process that removes VOCs from the soil by using proven technology and equipment."

Although SVE has been used successfully at many sites, there are critics of this technology who would state that it is not a "proven technology." To keep the statement factual, it is suggested that the paragraph focus on the definition of SVE and how conditions at this site facilitate extraction of VOCs.

8. Page 14, Multi-Agency Environmental Team Concur with Preferred Alternative, second paragraph, last sentence: This sentence states, "... the BCT agrees that the combination of Alternatives 8A and 10B' represents the optimal solution for remediation of Sites 18 and 24."

DTSC forwarded comments regarding the "Technical Memorandum for Groundwater Modeling of Alternative 8A (Proposed Preferred Scenario) for Remediation of the Volatile Organic Compound (VOC) Plume in the Irvine Subbasin Principal Aquifer for Operable Unit (OU) 1, Installation Restoration

Mr. Dean Gould  
May 3, 2000  
Page 3

Program (IRP) Site 18," on January 11, 2000. The comments stated that based on the limited information presented, the model simulation of Alternative 8A appears to be as effective as Alternative 6A in capturing the TCE plumes in the principal aquifer and shallow groundwater unit; however, DTSC requested an evaluation (with supporting tables and figures) of the simulation for Alternative 8A to ensure that the data is fully evaluated and comparisons between the alternatives are presented in an equivalent manner. Additionally, the Technical Memorandum must be signed by a Geologist or Civil Engineer, or a Certified Engineering Geologist or Hydrogeologist registered in the State of California. In the letter, a response to comments and a revised technical memorandum was requested prior to issuing the draft final PP so that DTSC will have adequate time to review and comment on the information prior to release of the final PP to the public.

To date, DTSC has not received the requested information. DTSC understands that the preferred alternative is the basis for the impending settlement agreement between the Department of Justice (DOJ) and the local water districts and that this agreement is a result of significant time and negotiation; however, the requested information would be useful for DTSC to ensure that the preferred alternative is fully evaluated and compared to the other alternatives in an equivalent manner and represents the optimal solution for remediation of Sites 18 and 24.

9. Page 15, The Marine Corps' Preferred Remedy, Alternative 10B', second sentence: This sentence states, "Alternative 10B' differs from Alternative 10B in that the minimum extraction flow rate is reduced from 800 gallons per minute to 440 to 550 gallons per minute."

Please provide clarification for why the preferred alternative (Alternative 10B') includes a decrease in flow rate and how the cleanup time is comparable to Alternative 10B.

10. Page 17, Evaluation of the Preferred Remedy, C. Modifying Criteria, 8. State Acceptance: This section states, "The State of California concurs with Marine Corps' preferred remedy for groundwater."

Please refer to Comment No. 8.

11. Page 19, What Happens After the Public Comment Period?: Due to the concerns expressed by the Restoration Advisory Board (RAB), it is recommended that a brief paragraph regarding continuing public involvement after the Record of Decision (ROD) is signed. This information should be

Mr. Dean Gould  
May 3, 2000  
Page 4

consistent with the letter dated January 25, 2000 from the United States Environmental Protection Agency (EPA) to the RAB regarding "Post ROD Stakeholder Participation."

If you have any questions, please contact 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, 2<sup>nd</sup> Floor  
Santa Ana, California 92703

Mr. Dean Gould  
May 3, 2000  
Page 5

cc: Mr. Steven Sharp  
Orange County Health Care Agency  
2009 East Edinger Avenue  
Santa Ana, California 92705