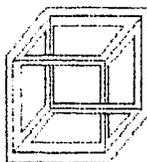


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Attachment I

Specific Comments Regarding
The Draft Technical Memo
"VERIFICATION OF PERCHLORATE AT IRP SITE 1..."
June 2000

3 September 2000

To:
Mr. Dean Gould
BRAC/BEC
Department of the Navy, Southwest Division
1220 Pacific Highway
San Diego, CA 92132-5190

via fax: 619-532-4160

Dear Mr. Gould:

Specific comments from the RAB Technical Subcommittee on the Perchlorate Study released June 2000 are contained in Attachment I. These comments represent the consensus of the Subcommittee and have been expressed verbally at various public meetings. This letter and attachment formalizes our response in writing, since we are confident that this is not the end of any studies regarding perchlorate contamination at the former MCAS El Toro.

What is the DoN method of response to the RAB Subcommittee comments regarding this Report? There appears to be no plan for further action contained in this report.

If you need further information, please contact me at your convenience.

Sincerely,

Charles R. Bennett Ph. D.
Chr, RAB Technical Subcommittee

cc: USEPA
DTSC
RWQCB

BL Associates
224 W. Jacaranda Place
Fullerton, CA 92832
714-773-5525

PROVIDED AT 9/27/00 MCAS EL TORO
RAB MEETING BY DR. CHARLES BENNETT,
MCAS EL TORO RAB SUBCOMMITTEE CHAIR

The report by EARTH TECH, Inc. of June 2000 was accompanied by a cover letter by Dean Gould dated June 9, 2000. This cover letter states "While reviewing this very encouraging news,..." I was unable to find any conclusions presented by EARTH TECH other than that perchlorate was localized, according to their study of Site 1, near monitoring well 01MW201.

On page 1-1, EARTH TECH states that "The evaluation was conducted in response to regulatory comments provided in Appendix A." In Appendix A the DTSC had questioned not only Site 1 but also Site 3 and along north-south runway. No mention was made of the ordnance storage bunkers north northeast area of Site 1 which could have contained perchlorate containing ordnances.

Glenn Kistner's letter of 2/26/99 has not been fully answered to say the least. This includes plans for testing and monitoring near pumping station for the desalter.

The Conclusions reached in the report on page 5-1 show that the groundwater flow is some feet/year rate. This would say that the additional wells were placed some 100 years away from the one of the sources and that there could be a large number of individual hot spots that were undetected. It also suggests that the surface runoff might be very important to the flow of perchlorate contaminated water. It would be helpful if EARTH TECH, Inc. addressed this issue and made soil tests in the wash areas on the site. In their assessment of tasks to be accomplished no mention was made of the runoffs. It is interesting to note that even though perchlorate is very soluble, some perchlorate was found in the soil. No explanation is given for the source of the soil perchlorates.

EARTH TECH, Inc. had made a search of previous documents about the EOD at Site 1 including reports on the activities that were conducted at the Site. It would be very helpful for them to discuss their findings relative to possible sources of perchlorates and possible radioactive sources that were mentioned in the documents. These included interviews with former personnel of the EOD.

Prepared by
JOSEPH FARBER Ph. D.

BL Associates

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