STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
REGION 4
[illegible] ST BROADWAY, SUITE 350
[illegible] EACH, CA 90802

October 21, 1991

Mr. Larry Nuzum
Remedial Project Manager
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

Dear Mr. Nuzum:

RCRA FACILITY ASSESSMENT/DRAFT SAMPLING VISIT WORKPLAN -
EL TORO MCAS

The Department of Toxics Substances Control has reviewed the above mentioned document and has enclosed the following general and specific comments.

If you have any questions, please contact Mr. Manny Alonzo at (213) 590-4904.

Sincerely,

Albert Arellano, Jr., P.E.
Unit Chief
Site Mitigation Branch

Enclosures

cc: Mr. John Hamill
Remedial Project Manager
U. S. Environmental Protection Agency
Hazardous Waste Management Division, H-7-5
75 Hawthorne Street
San Francisco, California 94105

Mr. Ken Williams
Water Resource Control Engineer
Regional Water Quality Control Board
Santa Ana Region
2010 Iowa Avenue, Suite 100
Riverside, California 92507

General Comments

In general, the format and content of the workplan are adequate.

The Department believes that this Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) should not be an isolated effort. The Department believes that the objectives of this RFA should be more ambitious than those of a normal RFA. The data obtained from this RFA should be of enough relevance to be used in the Remedial Investigation/Feasibility Study (RI/FS). Furthermore, sampling should not only verify whether a release has occurred but also verify the chemical composition of the release.

The Department requests that total petroleum hydrocarbons (TPH) and total fuel hydrocarbons (TFH) analytical methods be replaced by Laboratory Routine Analytical Services (RAS) Target Compound List (TCL) semivolatile organic compounds at sampling locations where no semivolatile organics analysis are scheduled. Also, eliminate TPH and/or TFH at sampling locations where semivolatile organics are already scheduled. Both, TPH and TFH, do not identify individual compounds. Therefore, the data obtained from TPH and TFH results are neither relevant nor usable in the RI/FS for baseline health risk assessment purposes. On the contrary, semivolatile organics results identify individual compounds, give more information on the composition of the release, and can be used in the RI/FS.

Specific Comments

Signature Page: The title of the workplan should make reference to the RFA.

1.0 Objective, page 1-1: The Department believes that the objectives of this RFA should be more ambitious than those of a normal RFA in order to make it meaningful in the context of the RI/FS. The data obtained from this RFA should be of enough relevance to be used in the Remedial Investigation/Feasibility Study (RI/FS). Furthermore, sampling should not only verify whether a release has occurred but also verify the chemical composition of the release. In specific, TPH and TFH data are not relevant to the RI/FS for the reason mentioned above.

The Department believes that analyzing for TPH and TFH during the RFA and analyzing for semivolatile organics during the RI/FS is redundant and inefficient.

page 1-2, second bullet: This assumption is generally valid for most of the sites handling jet fuel. However, soil vapor sampling would be helpful at SWMU/AOCs where TCE and other low-boiling point solvents/fuels were handled.

Figure 75, page 3-77: The sampling location is not drawn on the map.

Table 4-2, page 4-33: As mentioned in the general comments, the Department request that the proposed analytical parameters be modified as follows:

1 = Samples are to be analyzed for the entire Laboratory Routine Analytical Services (RAS) Target Compound List (TCL) for organics and Target Analyte List (TAL) for metals.

2 = Samples are to be analyzed for TCL, volatile and semivolatile.

3 = Samples are to be analyzed for PCBs in addition to TCL, volatile and semivolatile.

4 = Samples are to be analyzed for Dioxins in addition to TCL, volatile and semivolatile.

4.2 Sampling Strategy, bullet at the end of page 4-36: "...Soil sampling and analysis will determine whether a release has occurred, and will also identify the release contaminants and their concentrations in the soil." This statement is correct for TCL, TAL, PCBs and dioxins analyses, is not completely true for TPH and TFH analyses. TPH and TFH will determine whether a release has occurred, they will not identify the contaminants and their concentrations. The Department's concept of contaminant is a single chemical compound with specific toxicity.

Table 4-3 Proposed Laboratory analyses for RFA sampling visits: As mentioned above, TPH and TFH analyses should be eliminated or substituted by semivolatile organics. Because of the proximity of some sampling locations, the table should list all the SWMU/AOCs numbers covered by the sample(s), e. g.: 76 and 77, 84 and 85, 162 and 163.

4.3.1 Areas proposed for analysis for a wide range of parameters: Samples should be analyzed for the entire Laboratory Routine Analytical Services (RAS) Target Compound List (TCL) for organics and Target Analyte List (TAL) for metals. Additional Special Analytical Services (SAS) for TPH and TFH are redundant and should be eliminated.

4.3.2 Areas proposed for analysis for TPH (or TFH) and volatile organics only: TPH and TFH should be replaced by semivolatile organic compounds analysis, as requested above. In other words, this areas should be analyzed for the Laboratory Routine Analytical Services (RAS) Target Compound List (TCL) for organics, volatile and semivolatile.

4.3.3 Areas proposed for analysis for PCBs, TPH, and volatile organics only: TPH should be replaced for semivolatile organic compounds analysis, as requested above. In other words, this areas should be analyzed for the Laboratory Routine Analytical

Services (RAS) Target Compound List (TCL) for organics, volatile and semivolatile and PCBs.

5.0 Request for analysis: As mentioned before, TPH and TFH are redundant and not appropriate for RI/FS data needs. Therefore should be eliminated from the analytical parameters.

Table 5-1 Analyses requested: soil: Again, TPH and TPH should be eliminated from this table. The table shows glass jars and vials for all samples. However, Section 6.2 Sample collection describes procedures for collection of subsurface and shallow soil with stainless steel or brass liners. Please, correct this table to reflect the sampling collection procedures. Whenever possible, the Department recommends the use of liners for soil sampling over glass jars.

Appendix A, Data Quality Objectives, Table 2-2, Attachment 2: Once more, TPH and TFH should be eliminated from the analytical parameters.