



## Department of Toxic Substances Control



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SSIC #5090.3

September 12, 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

FINAL GROUNDWATER MONITORING REPORT OCTOBER-NOVEMBER 1998,  
ROUND 8 SAMPLING AND GROUNDWATER MONITORING DATA SUMMARY  
REPORT, 1999 MONITORING ROUNDS 9, 10, AND 11, MARINE CORPS AIR  
STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the following documents:

1. Final Groundwater Monitoring Report October - November 1998, Round 8 Sampling, dated May 24, 2000, and received by this office on June 9, 2000.
2. Groundwater Monitoring Data Summary Report, 1999 Monitoring Rounds 9, 10 and 11, dated June 30, 2000, and received by this office on August 8, 2000.

The documents summarize the results of groundwater field sampling activities conducted from 1998 (Sampling Round Number 8) and 1999 (Sampling Round Numbers 9, 10 and 11).

After review of the documents, DTSC has the following comments.

1. DTSC understands that these data summaries were prepared in an effort to issue overdue groundwater monitoring data. However, these data summaries are not consistent with the Groundwater Monitoring Report format presented in the *Draft Final CERCLA [Comprehensive Environmental Restoration, Compensation and Liability Act] Groundwater Monitoring Plan, Marine Corps Air Station, El Toro, California (Plan)* (Bechtel National, Inc., June 1999).

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One of the main objectives of this groundwater monitoring program is to evaluate field and analytical data for trends in potentiometric levels, hydraulic gradients, water quality and plume migration. As written, these documents do not include data evaluation or the associated maps and graphs. Please revise the documents to include the information and evaluation specified in the Plan or provide a comprehensive evaluation of this data in the Groundwater Monitoring Report for the next annual sampling event.

2. Further, these documents indicate that groundwater monitoring of the site is not being conducted as specified in the Plan.

Please provide an explanation for any deviations from the Plan to the Base Realignment and Closure Cleanup Team in accordance with Section 1.2, Monitoring Plan Purpose, of the Plan that states, "Proposed modifications to the GMP [Groundwater Monitoring Plan] will be submitted to the regulatory agencies for review and will only be implemented following regulatory agency approval."

If you have any questions, please contact me at (714) 484-5395.

Sincerely,



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Remedial Project Manager  
Southern California Branch  
Office of Military Facilities

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