



California Regional Water Quality Control Board

Santa Ana Region



Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb8>
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (909) 782-4130 - FAX (909) 781-6288

Gray Davis
Governor

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov/rwqcb8.*

February 26, 2001

M60050.000762
MCAS EL TORO
SSIC #5090.3

Mr. Dean Gould
BRAC Environmental Coordinator
MCAS EL Toro
P.O. Box 51718
Irvine, California 92619-1718

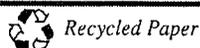
COMMENTS ON IMPLEMENTATION STRATEGY DEMONSTRATION OF TCE OXIDATION USING POTASSIUM PERMANGANATE, IRP SITE 24, FORMER MARINE CORPS AIR STATION, EL TORO

Dear Mr. Gould:

We have completed our review of the above referenced document, dated December 1999, which we received on December 24, 1999. We have the following comments on this report:

1. **Section 2. SYSTEM MONITORING**, Page 2-1: There are concerns of: 1) possible formation of hexavalent chromium, 2) the possibility of introducing hexavalent chromium that may be present in trace amounts in the LIQUOXTM and 3) the possibility of mobilizing metals. As a result of these concerns, the monitoring should include analysis for hexavalent chromium and priority pollutant metals. Additionally, please note that there is a new California Preliminary Health Goal (PHG) of 2.5 µg/l for hexavalent chromium.
2. We believe that monitoring of a downgradient well would be appropriate for observation of long term residual effects of this demonstration. A well such as 12-ugmw31 should be sampled quarterly for VOCs, metals, electrical conductivity, pH, and dissolved oxygen, for a period of one year after the initiation of the proposed demonstration.
3. In your pilot test, you plan to inject reagents into the groundwater, thereby inducing an expected chemical reaction. Before proceeding with this project, we request that you identify all compounds, including the concentrations and dilution factors, that are to be used or generated during and after the introduction of the reagents. Compounds or elements that will be released as a result of the introduction of chemical reagents will be considered a discharge of waste to the groundwater. Therefore, we must evaluate whether such wastes are a threat or potential threat to beneficial uses of the groundwater. Be advised that, depending on the nature of the material, any discharge of waster into a groundwater aquifer may:
 - a. be considered as no impact to beneficial uses, therefore qualifying for a waiver from waste discharge requirements;
 - b. be subject to waste discharge requirements from the Board (or the

California Environmental Protection Agency



Mr. Dean Gould

-2-

February 26, 2001

substantive requirements of WDRs), prior to commencing discharge; or
c. be prohibited.

For any questions on this review or related matters, please call me at (909) 782-4498.

Sincerely,


John Broderick
SLIC/DoD/AGT Section

cc: Ms. Nicole Moutoux, U.S. Environmental Protection Agency, Region IX
Ms. Triss Chesney, Department of Toxic Substances Control, OMF
Mr. Gregory F. Hurley, RAB Co-Chair, MCAS El Toro
Ms. Content Arnold, Naval Facilities Engineering Command, SWDIV

California Environmental Protection Agency



Recycled Paper

TRANSMITTAL

Date: 5 Mar 2001

From: Lynn Marie Hornecker *AMH*
MCAS El Toro

To: Diane Silva
Code 01LS.DS

Subj: CERCLA Administrative Record Materials
Marine Corps Air Station, El Toro

Installation: Marine Corps Air Station, El Toro

UIC Number: M60050

Document Title (or subject):

Author: John Broderick, RWQCB

Recipient: Dean Gould, BEC

Record Date: 26 Feb 2001

Approximate Number of Pages: 2

EPA Category: 01.1

Sites: IRP Site 24

Key Words: Demonstration project, ~~for~~ groundwaters

Contract: N/A

CTO Number: N/A

*Comments on Implementation Strategy Demonstration
of TCE Oxidation using Potassium Permanganate,
IRP Site 24*