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APPROVAL

OTHER

Govt (Agency) comment "DRAFT Operable Unit 1
Remedial Report"

ACTION REQUIRED

WORK AUTHORIZATION
(R. Ward)

TITLE: AGENCY COMMENT "DRAFT OPERABLE
UNIT 1 REMEDIAL REPORT"

OTHER

AUTHOR: JOHN BRODERICK/CRWQCB

DATE: 08/15/94

CATEGORY: 3.4

**CC:
SAN DIEGO**

PASADENA

OTHER

- PMO File
- E. BANKS (PM)
- B. ROBSON
- S. MONTIJO
- L. JONES
- DATABASE ENTRIES
- J. HUGHES
- J. SHEKER (Tickler)
- H. MONEGUE (Property)
- _____
- _____

- PAS File (distribution)
- R. PORTILLO (LRCM)
- D. LONGPRE (QA)
- D. SMITH (H&S)
- M. MCCLURE (SM)
- M. BELL (CM)
- R. WARD (RFPs)
- CA: _____ *
- B. MICHELL (PCM)
- K. Spathias (for distr)
- CS/E: _____ *
- ____ CTO NOTEBOOK

- Lead PjM (for Activity) _____ *
- CTO PjM _____ *
- G. Rufford (Interim MTPQC) (JEG)
- S. TSAI (RCM) (IT)
- R. GATES (IT) (for distribution)
- K. TOMEO (CH2M) (RCM)
- M. EMBREE (CH2M) (for distribution)
- TR: _____ *

Dist: RFPs-(PM, LRCM, CM, PCM 280 PJM) Fax initial RFP to R. Ward, CM, LRCM, PCM, & PM. They will review for CP funds and dist. further w/WAF

MODs, Stop Work Orders- (RCMs, CM, CA, LPjM, PjM, PCM, CSE, 280 PjM)

COMMENTs-(Full set to LRCM, RCM(s), LPjM, PjM, TR, MTPQC cover sheet to others noted). PM to receive full sets of Code 185 comments/top copy of all others.

CLOSE-OUT LETTERS-PM, RCM(s), CM, CA, PCM, CSE, MTPQC, LPjM, PjM)

*LOCATION DESIGNATOR: 1-Pasadena 2-Denver 3-CH2M 4-IT 5-San Diego

***NOTE: Location designator dictates further distribution to applicable RCMs.

of California

Memorandum

To: Mr. Albert A. Arellano, Jr., P.E. **Date:** August 15, 1994
Department of Toxic Substances
Control, Base Closure Branch
245 West Broadway, Suite 425
Long Beach, California

From: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION
2010 IOWA AVENUE, SUITE 100, RIVERSIDE, CALIFORNIA 92507-2409
Telephone: CALNET 632-4130 Public (909) 782-4130

Subject: Marine Corps Air Station, El Toro, Comment on the Draft
Remedial Investigation Report

We have completed our review of the Draft Operable Unit 1 Remedial Investigation Report dated July 1, 1994, which we received July 5, 1994. We believe that the Marine Corps and Navy have failed to complete a fundamental and routinely required aspect of a groundwater investigation, systematic groundwater monitoring. Therefore, we must recommend that the Draft Remedial Investigation Report be reject as incomplete and lacking in data acquisition. We have the following general comments to be incorporated and be forwarded to the Marine Corps and Navy:

Quarterly groundwater sampling

The report identified that ninety two groundwater monitoring wells were installed (majority in 1992) for this investigation, in addition to groundwater monitoring wells previously installed and groundwater monitoring wells installed for leaking underground storage tank sites. The normal procedure in groundwater investigations, after it is determined that a groundwater monitoring location is appropriate, to quarterly sample the well for chemicals of concern. We recommend in guidance and usually require at least four consecutive quarterly samplings of all new wells. We believe the Marine Corps and Navy have failed to properly sample as normally and routinely expected for the groundwater monitoring locations installed for this investigation. Therefore, we must recommend that the OU1 Draft RI Report be rejected until such time as the wells can be sampled as normally and routinely completed groundwater investigations.

ALBERT A. ARELLANO, JR.

AUG 17 1994

Department of
Toxic Substances Control

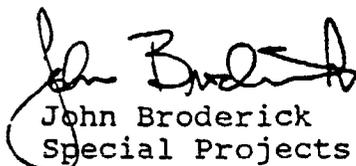
Water level measurements

Only a limited number of groundwater elevation contour maps are included in the Draft Report but data is listed in the Appendix for July 1992 through April 1994. We have in the past requested that groundwater elevation contour maps be prepared and provided after each collection event. We are presented only raw data tables in Phase I Technical Memorandum and this Report which is not consistent with the Federal Facility Agreement Section 22.1 and the Data Management Plan. Why have we received and continue to receive resistance to our requests for groundwater elevation contour maps for all groundwater elevation collection events? Additionally, we believe that all groundwater monitoring wells on and off station should be included in the program until a groundwater monitoring plan can be approved and implemented which will specify which points for individual aquifers should be measured routinely and at what interval.

Conceptual model of the subbasin hydrogeologic system

Numerous references to a conceptual model "see Appendix A of the OU-1 IAFS (Volume VI)" are throughout the OU 1 Draft RI. This referenced appendix was not provided with the Draft RI for review, therefore, it should be provided as an RI reference or not referenced in the RI.

For any questions on this review or related issues, please contact me at (909) 782-4494.


John Broderick
Special Projects Section