

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

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MCAS EL TORO  
SSIC # 5090.3

June 20, 1995

Mr. Joseph Joyce  
BRAC Environmental Coordinator  
U.S. Marine Corps Air Station - El Toro  
P. O. Box 95001  
Santa Ana, California 92709-5001

Dear Mr. Joyce:

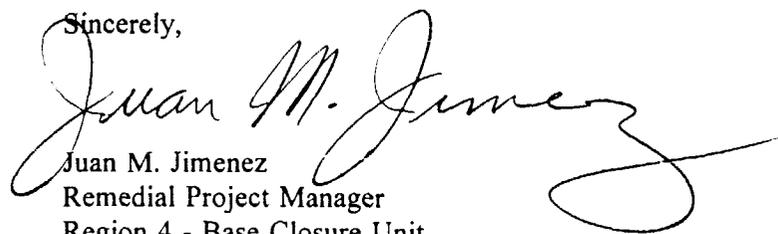
**REVIEW COMMENTS ON THE REVISED FIELD SAMPLING PLAN, PHASE II,  
REMEDIAL INVESTIGATION / FEASIBILITY STUDY (FSP), MARINE CORPS AIR  
STATION (MCAS) EL TORO**

The Department of Toxic Substances Control (DTSC) has completed its review of the above mentioned Work Plan. General and specific comments are enclosed. These are in addition to the comments previously submitted by the DTSC.

The Department will be available for a comment resolution meeting(s) either in person or via a telephone conference as necessary.

We look forward to working with you on these and other issues. Feel free to contact me at (310) 590-4919.

Sincerely,

  
Juan M. Jimenez  
Remedial Project Manager  
Region 4 - Base Closure Unit  
Office of Military Facilities

Enclosures

cc: Ms. Bonnie Arthur  
U. S. Environmental Protection Agency  
Region IX  
Hazardous Waste Management Division, H-9-2  
75 Hawthorne Street  
San Francisco, California 94105-3901



Mr. Joseph Joyce  
June 20, 1995  
Page 2

cc: Ms. Bonnie Arthur  
U. S. Environmental Protection Agency  
Region IX  
Hazardous Waste Management Division, H-9-2  
75 Hawthorne Street  
San Francisco, California 94105-3901

Mr. Lawrence Vitale  
Remedial Project Manager  
California Regional Water Quality Control Board  
Santa Ana Region  
2010 Iowa Avenue, Suite 100  
Riverside, California 92507-2409

Mr. Jason Ashman  
Department of the Navy  
Naval Facilities Engineering Command  
Environmental Division  
1220 Pacific Highway, Room 18  
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Mr. David Cowser  
Bechtel National, Inc.  
401 W. "A" Street, Suite 1000  
San Diego, California 92101-7905

Mr. Vish Parpriani  
Environmental and Safety  
Marine Corps Air Station-El Toro  
P. O. Box 95001  
Santa Ana, California 92709

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

Region 4

West Broadway, Suite 425  
Beach, CA 90802-4444**MEMORANDUM**

**TO:** Juan Jimenez  
Office of Military Facilities  
Base Closure Unit  
245 West Broadway, Suite 425  
Long Beach, California 90802

**FROM:** Geological Support Unit  
245 West Broadway, Suite 425  
Long Beach, California 90802

**DATE:** 19 June 1995

**SUBJECT:** *COMMENTS ON THE FIELD SAMPLING PLAN PHASE II REMEDIAL INVESTIGATION/FEASIBILITY STUDY, MARINE CORPS AIR STATION EL TORO, CALIFORNIA*

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**Introduction**

As requested, the Geological Support Unit (GSU) of the Department of Toxic Substances Control (DTSC) has provided additional site-specific comments on the document entitled Draft Field Sampling Plan Phase II Remedial Investigation/Feasibility Study, MCAS El Toro, California (*FSP*). This document was prepared by Southwest Division, Naval Facilities Engineering Command (Navy), in conjunction with Bechtel National, Inc. (Bechtel).

General comments and some specific comments for the *FSP* were issued 24 May 1995. Below are a few additional general comments and some additional site-specific comments.

**General Comments**

1. When applicable, show abandoned wells on site-specific maps.
2. At a minimum, show the identifiers for all existing soil gas locations on all figures.
3. Five of the locations where soil gas samples were collected during the June 1994 soil gas survey should be resampled during the Phase II field activities. This will tie the two soil gas surveys together when comparing the results of both surveys.



4. Discuss the connection between the site-specific investigations and the VOC source area investigation.
5. If "no further investigation" is proposed for a site, unit, or SWMU/AOC, provide the reference such as a report, workplan, meeting notes, or the BCP stating the BCT decision for no further investigation designation. Simply stating that a "no further action or investigation" pathway is or was recommended is not sufficient.

### Site-Specific Comments

#### Site 2

6. Figure B3-3 - Correct the "double location" of well 05\_UGMW27 shown on the west side of the map.

Does the "Phase II monitoring well" symbol shown on the east portion of the map near well "D"2\_DGMW25 belong on this figure?

Correct D2\_DGMW25 to 02\_DGWM25.

7. Show aerial photograph anomalies noted in previous reports (Comment 6a in the Response Summary). Consider collecting judgmental samples located within the identified anomalies.
8. Clarify in more detail surface geophysics strategy to determine landfill boundaries. Once the boundaries of the landfill are determined and the BCT agrees on the interpretation of the boundaries, an on-site meeting should take place to decide strategies for trenching.
9. Page B4-6 and Page B6-5 - Discuss groundwater sampling protocol in more detail.
10. Note: this comment refers to the Workplan. Add a discussion regarding Hydropunch activities in the Workplan DQOs.
11. Page B4-7, Section 4.3.2.3 - Include the letter designation for well 18\_DGMW03 and the depth of the screened interval.
12. Page B4-7, Section 4.3.2.3 - If the BCT decides to install New8 monitoring well to serve the purpose of an upgradient well, then the location of the well should be farther upgradient than shown on Figure B3-2.

Mr. Juan Jimenez  
19 June 1995  
Page 3

### Site 3

13. A section of Agua Chinon Wash that runs through Site 3 is unlined. There has been some discussion about lining this portion of the wash. Include a discussion regarding this issue.
14. Page C44-7, Section 4.2.4.2 - Please insure that a soil gas sample will be taken at the same location as the soil matrix sample was taken that showed elevated concentrations of VOC at SWMU/AOC 194.
15. Please indicate the location of all pits, trenches and anomalies identified in previous documents (refer to comment 1A of the DTSC Response Summary)
16. Will there be any attempt to determine the unknown thickness of the soil layer covering the landfill?
17. Dioxin analysis should be considered at SWMU 194 if results show elevated concentrations of PCBs.

### Site 5

18. Show the proposed location of the downgradient well on Figure E-2.
19. It was discussed earlier that at least two feet of fill covers this site. If this is true it needs to be shown and the integrity needs to be documented, especially if a presumptive remedy is the remediation decision.

### Site 7

20. Soil gas probe location 24\_SG355 showed 2 ug/l of PCE, 531.2 ug/L of TCE and 383 ug/l of 1,1 DCE, totaling 916.2 ug/l VOCs at a 15 foot depth. It is difficult to determine if this area will be addressed under Site 24, if so please state it in the text.
21. Provide an expanded overview site map to include the location of well 07\_DGMW91. It would be helpful if Site 8, Site 10, Building 296 and 297 were also shown on the map.

### Site 8

22. There are existing soil gas locations showing VOC hits. How will this be addressed and to what extent will the elevated concentrations of VOCs be delineated? This is of particular concern because the removal action will be driven by constituents such as PCBs that are

generally found at much shallower depths than VOCs.

23. As stated at the 28 April 1994 technical exchange meeting, if it can be documented that the fill that underlies this parking lot was imported after the yard was no longer used, then no further investigation is acceptable. Otherwise, conduct field screening soil sampling of surface soil only.
24. On appropriate figures, indicate the locations of the trenches observed in the western portion of the site in the 1952 aerial photograph.

Site 12

25. Please add this site to the Site 24 soil gas investigation. Add two locations at Unit 1 and two locations at Unit 2. At each location collect samples at two depths.

Site 15

26. It is recommended to collect soil gas samples, then guide the location of the soil matrix samples from the soil gas results.

Site 17

27. Please note, it may be difficult to define groundwater gradient using the proposed well locations shown on Map Q3-2. As discussed previously, the location of NEW1 may not be possible due to the underlying geological unit. Please propose a new location.

Site 19

28. Please provide an explanation regarding the black hose that was observed extending from the side of Aqua Chinori Wash observed during the 02 May 1995 site visit.

Site 24

29. Check the locations of the soil gas probes. Do they coincide with VOC detects at the OU-3 sites?
30. Five of the locations where soil gas samples were collected during the June 1994 soil gas survey should be resampled during the Phase II field activities. This will tie the two surveys together, strengthening the interpretation of the results when comparing the data.

Mr. Juan Jimenez  
19 June 1995  
Page 5

31. Since it has been agreed by the BCT not to analyze for VOCs in surface water samples, delete all reference regarding this issue in the FSP.
32. Provide a detailed discussion regarding air sparging and soil vapor extraction. Will there be a formal presentation for the BCT before the design implementation of these systems?
33. Provide a more detailed discussion regarding aquifer pump tests.
34. Please show locations of CPT on Map W3-9.
35. Note: this comment refers to the Workplan. Building 655 is marked as Building 855 on all site-wide maps in Appendix W.
36. Note: this comment refers to the Workplan and the FSP. The locations of Buildings 333, 386, and 1589 located on Figure 1-3 of the Workplan are not consistent with the locations on the site-wide maps in Attachment W and Appendix W.
37. Building 312 is missing from site-wide maps in Attachment W and Appendix W.

Thank you for the opportunity to review and comment on this document. If you have any questions, please contact me at extension 5528.



Sherrill Beard, RG  
Geologist  
Geological Support Unit



Concur: Karen Thomas Baker, CEG  
Unit Chief  
Geological Support Unit