

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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December 29, 1994

Mr. Jose Payne
Code 1812.JP
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5151

Dear Mr. Payne:

**COMMENTS ON RCRA FACILITY ASSESSMENT DRAFT SAMPLING VISIT
WORKPLAN**

Enclosed are the Department of Toxic Substances Control comments regarding the above-mentioned document dated October 19, 1994.

If you have any questions, please contact me at (310) 590-4926.

Sincerely,

for Majed Ibrahim
Remedial Project Manager
Base Closure Unit
Office of Military Facilities

Enclosure

cc: Ms. Alice Gimeno
State Project Team Leader
Office of Military Facilities
Southern California Operations
Department of Toxic Substances Control
245 West Broadway, Suite 425
Long Beach, California 90802-4444



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Mr. Larry Vitale
Remedial Project Manager
Regional Water Quality Control Board
Santa Ana Region
2010 Iowa Avenue, Suite 100
Riverside, California 92101-7905

Mr. Dave Hodge
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Ms. Denise L. Chandler
BRAC Environmental Coordinator
P.O. Box 105001
Santa Ana, California 92710-5001

The purpose of this RFA was to investigate previously identified areas of concern (AOCs) through the Resource Conservation and Recovery Act (RCRA) facility assessment (RFA) process. This RFA generally follows the data quality objectives (DQOs) developed during the meetings held in March and June 1994.

The following comments are directed to the Navy and their consultants:

GENERAL COMMENTS

1. **Companion Documents:** Provide a comprehensive Sampling and Analysis Plan (SAP) and a Quality Assurance Project Plan (QAPP). Both the SAP and QAPP should be approved before the occurrence of any field activities.
2. **Standard Operating Procedures (SOPs):** All SOPs that are applicable to this investigation should be included in the appropriate companion documents. Please do not include procedures that do not apply to this specific investigation. If it is agreed upon that a SOP master control copy will be supplied to DTSC then it is not necessary to attach the complete description of each SOP to the work plan. However, if it is decided not to include the SOPs in the work plan it is recommended that either the field team leader or the CTO leader sign a document stating that the field technicians have read and understand the appropriated SOPs. This signed document would be included in the final report.

All references pertaining to SOPs should include both the section and page number location within the SOP master control copy.

Any field or laboratory procedures, including any modified procedures, that are not provided in the SOP master copy should be included in the SAP or QAPP.

3. **Analytical Methods (Page 3-9):** Analytical methods are described as similar to specified USEPA methods, however in Appendix E only standard methods are provided in the form of generic SOPs. If standard methods are to be modified, then the changes must be reflected in the SOPs provided in either the SAPP or QAPP.
4. **On-site Laboratory Methods:** Provide a description of all proposed on-site laboratory methods and include all QA/QC information.
5. **Accountability of AOCs:** As presented in the RFA, it is unclear as to the exact number of AOCs to be investigated, therefore, prior to the implementation of this investigation provide a mechanism to account for each AOC.

6. **Map Scales:** Provide a scale on each site map in the RFA. It was understood that although there may not be map scales in the draft work plan there would be map scales in the final work plan.
7. **Sample Collection and Analysis:** Clarify in the final RFA work plan which samples will be *collected and archived* and which samples will be *collected and analyzed*.
8. **Section 8.5.2 Application of the Action Criteria:**

Page 8-10, Bullet 4: It is stated "Those analytes whose measured concentrations are less than 20 percent greater than the 95th percentile of the background concentration will be considered to be within the normal range of concentrations for MCAS Tustin, and no further action will be required." This criteria is not appropriated during this stage of the investigation. If the 95th percentile is the estimator for the upper range of background, then extraneous factors should not be introduced. At this step of the investigation there should be conservative, well defined criteria.