

**DEPARTMENT OF HEALTH SERVICES**

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M60050.001810  
MCAS EL TORO  
SSIC # 5090.3

April 12, 1988

Mr. Ernest Cerini  
Officer In Charge Of Construction, Southwest  
1220 Pacific Highway, Building 131  
San Diego, California 92132-5190

Dear Mr. Cerini:

PLAN OF ACTION FOR MARINE CORPS AIR STATIONS AT EL TORO AND TUSTIN

Please find enclosed comments on the plan of action for Marine Corps Air Stations at El Toro and Tustin. The comments are divided into general comments and specific comments on particular items in the plan.

If you have any questions, please contact me at (213)620-5491.

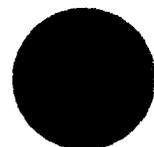
Sincerely,

*Tim Miles*

Tim Miles, Project Officer  
Assessment and Mitigation Unit  
Southern California Section  
Toxic Substances Control Division

PLAN OF ACTION FOR MARINE CORPS  
AIR STATION AT EL TORO AND TUSTIN

4-12-88



**General Comments:**

1. The overall adequacy of the work plan cannot be ascertained without the Health and Safety Plan and the Quality Assurance Plan.
2. The use of odor to detect contaminants and determine sampling locations is not an approved health and safety practice.
3. The use of the "Hydropunch" to take ground water samples should meet the recommendations set forth in the "RCRA Ground Water Monitoring Technical Enforcement Guidance Document" or be approved by the Department of Health Services (DHS) Alternative Technology Section.
4. Background samples are not addressed at many of the sites. Page 1-7, Section 1.4.2 states that the ground water flow is in a westerly direction but is reversed in the summer. Placement of monitoring wells upgradient may not actually be upgradient. The plan should provide more information on pumping well locations so that true upgradient locations can be determined.
5. Procedures for the abandonment of boreholes need to be specified.
6. DHS recommends that the soil in all boreholes be logged continuously.
7. Based on incomplete knowledge of the exact boundaries of all disposal sites, the plan should be reexamined to determine whether adequate numbers of samples are being taken. Several site figures show areas of contamination where few or no samples will be taken.

**Specific Comments:**

1. Page 2-7, Section 2.2.1  
Paragraph one describes the site. From the construction of the paragraph, it appears that the bermed area is used for the destruction of small munitions, flares, and other perishable ordnance. The paragraph needs to be clarified to show exactly where disposal occurred.
2. Page 2-8, Section 2.2.1  
The first paragraph states that the borehole will be backfilled with an impermeable material if necessary. The material should be specified.
3. Page 2-8, Section 2.2.1  
Since the types of munitions disposed of at the site are not clearly specified, the analytical procedures should include lead.
4. Page 2-20, Section 2.2.8  
Based on the maps provided, the plan is not clear whether the upgradient water sampling location is also upgradient for site 9.
5. Page 2-21, Section 2.2.9  
The samples should be analyzed for petroleum hydrocarbons. Background samples are not addressed.

6. Page 2-31, Section 2.3.3  
What are the other potential contaminant source areas mentioned in sentence number two?
7. Page 2-35, Figure 2-19A  
The figure shows areas of staining where no samples are being taken. DHS recommends that all areas where disposal occurred be sampled to determine the nature and extent of contamination.
8. Page 3-4, Section 3.5.1  
The text states that clean 12-20 mesh Monterey sand will be used for the filter pack. The sand for the filter pack should be determined by a sieve analysis done from the borehole cuttings. DHS does not recommend the use of PVC casing and screen in the saturated zone where contaminants may be absorbed into the plastic. DHS recommends that stainless steel be used. The method of placement of the grout should be specified.
9. Page 3-5, Section 3.5.2  
The well should be developed until the water does not exceed five nephelometric turbidity units.
10. Page 3-8, Section 3.8  
Where will the background soil samples be collected?