

RESPONSE TO
DEPARTMENT OF HEALTH SERVICES
COMMENTS

M60050.001811
MCAS EL TORO
SSIC # 5090.3

Response to General Comments:

1. Copies of the Health and Safety Plan and the Quality Control Plan for the Site Inspection POA will be forwarded.
2. All samples will be screened in the field by use of an HNU brand photoionization detector. Odor detection will be limited to the field personnel's notes of any detectable fuel related odor around a drill site. Note that the construction activities will take place using Level D protection with no respirators. If a fuel type contamination is encountered at a given depth, odor usually is the first detectable sign around the drill hole. This may be, in combination with HNU readings, the indication of potential upgrade of site safety level from D to C.
3. The Hydropunch water samples do meet the requirements of the said document. Suggestions will be made to the equipment's manufacturer to pursue DHS approval, if such approval has not already been obtained.
4. The plan essentially assumes background as the most upgradient well location in respect to the whole base. For those sites that such information is not adequately provided, a background well will be installed. For those sites that are located downgradient from another investigated site, the upgradient site will be utilized to assess background contamination potential, keeping in mind that the POA is for verification and not quantification. The gradient reversal is due to pumping effects and is localized around those irrigation wells. For the purpose of the Site Inspection the term "upgradient" is used to identify regionally upgradient conditions representative of long-term-average condition.
5. Borehole abandonment practices will follow the Orange County Health Agency guidelines. JMM common practice of borehole abandonment is by neat cement grout (cement grout mixed with a minimum of 3 percent by weight bentonite).
6. The dense soil conditions typically encountered in the area renders continuous sampling difficult and time consuming. For the purpose of the current investigation (verification) whereby the presence, and not the extent, of contamination is sought, such a procedure is not warranted.

7. It is believed that the POA stipulates adequate numbers of samples to identify the presence of any contamination. The areas of staining (not contamination) shown in the figures were identified mostly by the previous contractor. JMM site visits did not confirm the presence of staining in those areas that are not being sampled. This may be due to some surface cleanup and/or construction activities that have taken place at the bases. Stained areas identified by the previous contractor were left in figures to facilitate further visual field inspections at those locations, at which time a decision will be made to assess the need for sampling at those areas.

Response to Specific Comments

1. Page 2-7, Section 2.2.1
Figure 2-1, following Page 2.7, identifies the general and specific disposal area locations.
2. Page 2-8, Section 2.2.1
See response to Comment 5, above.
3. Page 2-8, Section 2.2.1
We are looking for FS Smoke only; lead is not part of the type of munition used to detonate FS Smoke.
4. Page 2-20, Section 2.2.8
The "northeast" on Page 2-20, paragraph 1, should be changed to read "northwest". Figures 2-7 and 2-8 show essentially the same areas (see BLDG 435 on both figures).
5. Page 2-21, Section 2.2.9
The POA is modified to include TPH analysis. Background is assumed to be clean in respect to TPH and PCB's.
6. Page 2-31, Section 2.3.3
See remainder of the paragraph.
7. Page 2-35, Figure 2-19A
See response to General Comment 7, above.
8. Page 3-4, Section 3.5.1
Adequate numbers of soil samples with geotechnical analysis exist from the area. For monitoring well construction, accomplishment of sieve analysis from each borehole is not justified. Stainless steel screen is not justified for the Site Inspection, where the presence of contamination is not known.

9. Page 3-5, Section 3.5.2
Since the wells are being drilled with augers, turbidity is not anticipated to be a problem. JMM will further evaluate development procedures if other drilling techniques are used.
10. Page 3-8, Section 3.8
See response to General Comment 7, above.