

**RESPONSE TO COMMENTS
DRAFT FINAL PHASE II REMEDIAL INVESTIGATION REPORT
FOR OPERABLE UNIT 2C - SITE 5
MCAS EL TORO, CALIFORNIA**

<p>Originator: Peter M. Janicki Cal/EPA</p> <p>To: Tayseer Mahmoud DTSC</p> <p>Date: 18 October 1996</p>	<p style="text-align: right;">CLEAN II Program Contract No. N68-711-92-D-4670 CTO-0076 File Code: 0214</p>
<p><u>GENERAL COMMENTS</u></p> <p>1. Generally, the responses do not address fully Board staff comments which were included in the letter of June 3, 1996. Adequate responses should answer all issues stated in the review letter including all necessary justification, and inform, where applicable, that appropriate changes have been made in the body of the document. The latest responses appear to address certain parts of the comments and only in a surficial manner.</p> <p>If necessary, Board staff are available to provide assistance in clarifying any issues related to their comments.</p>	<p><u>RESPONSES TO GENERAL COMMENTS</u></p> <p>RESPONSE 1: Comment noted. The failure to address your comments thoroughly was not intentional. We have gone back and reviewed your previous comments and our responses and have attempted to readdress areas of concern.</p>
<p>2. The response document lacks a table of contents and continuous page numeration, both of which make review of this document difficult and cumbersome. It is recommended that the format of the response document be revised to expedite its review.</p>	<p>RESPONSE 2: We agree that a table of contents may be helpful and will recommend that this be an improvement internally on future documents. Each set of responses does have pages for individual commentators.</p>
<p>3. The response document mistakenly associates Mr. Peter Janicki not with CAL EPA but with the U.S. EPA.</p>	<p>RESPONSE 3: This was a typographical error and has been corrected in this set of review comments.</p>
<p>4. Comments included in the letter of June 3, 1996, are identified as "General Comments." No such terminology was used in the original letter.</p>	<p>RESPONSE 4: Comment noted.</p>
<p><u>SPECIFIC COMMENTS</u></p> <p>5. The response to comment 1 does not address the request for site exploration data relevant to the disturbed ground areas. Also, a statement explaining why these land features do not appear on the drawings should be inserted in the text.</p>	<p><u>RESPONSES TO SPECIFIC COMMENTS</u></p> <p>RESPONSE 5: In regard to the surface disturbance southwest of the landfill trench, a detailed review of aerial photographs shows that vegetation in this area was cleared from the surface by traffic crossing this undeveloped area. It may have been a temporary staging area, however, no landfilling activities or construction was found in the aerial photographs. Therefore, the area disturbance is not impacted by proposed remedial action. The aerial</p>

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	<p>photographs are available in the reference SAIC document.</p> <p>The impoundment which was evident on aerial photographs from 1971 through 1980 appears to be related to the use of the area northwest of the landfill for a construction staging area. In various photographs during this period, equipment and supplies are apparent on the photographs. This structure also will not affect the proposed remedial action at the site.</p> <p>Site investigations of the both areas are included within the Phase II study area boundary. The only evidence of potential to the northwest was found in soil gas and possibly the groundwater contamination to the north of the landfill may have originated from the staging area activities.</p> <p>This discussion will be included in the final RI.</p>
<p>6. In comment 2, Board staff inquired not only about previous geophysical studies but also about exploratory trenching. This part of Board staff inquiry has not been answered. Also unanswered remains the issue of more rigorous study on the vertical extent of the landfill. All relevant drawings depicting vertical cross sections of the landfill show the bottom of the landfill using “?” symbol, which implies inconclusive information.</p> <p>Additionally, Board staff requested that the terminology be unified for identifying areas covered in Phase I Site Investigation and Phase II Site Investigation.</p>	<p>RESPONSE 6: Geophysical surveys and trenching were conducted in the Phase II RI to investigate the portions of the site for which the Phase I RI did not provide specific information on the horizontal extent of the landfill. This will be included in the final RI.</p> <p>After specific review by regulatory agencies (especially the RWQCB), no borings were to be placed in the landfill trench because it was thought that this would create a conduit for infiltration. Therefore, the depth of the landfill is shown with question marks, however, interviews indicate that trucks entering the landfill trench were not visible from the surface. Based on this information, the landfill trench is shown as being approximately 15 feet deep.</p> <p>Additional statements will be added to emphasize that the Phase II RI was not only to address U.S. EPA presumptive remedies for landfills but also to augment information from previous investigations to satisfy the DQOs developed for this site.</p>

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<p>7. The response to comment 3 does not address issues raised by Board staff in regards to using 14 CCR 17783.5 as a guide for the subsurface gas survey. The response does not explain which elements of this regulation were used and to what extent. In the letter of June 3, 1996, Board staff have pointed out that this regulation applies to permanent monitoring structures with monitoring depths reflecting the actual vertical configuration of the landfill. Also, as previously mentioned, site investigation did not yield conclusive findings. Thus, unless satisfactory justification along with conclusive landfill vertical extent documentation are provided, it is requested that the reference to 14 CCR 17783.5 be removed from the text.</p>	<p>RESPONSE 7: The perimeter soil gas samples were collected with direct push samplers. Permanent sampling wells were not constructed. Since this does not comply with 14 CCR, Section 17783.5, the reference to this regulation has been deleted from the text.</p>
<p>8. The response to comment 4, which suggested clean closure of this waste management unit, should be substantiated by volumetric and cost effectiveness analyses (they may be included as a part of feasibility study).</p>	<p>RESPONSE 8: Clean closure costs and volumetric analyses are included in the Site 5 Draft Final Feasibility Study.</p>