

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

Region 4  
245 West Broadway, Suite 425  
Long Beach, CA 90802-4444  
(310) 590-4868



M60050.002632  
MCAS EL TORO  
SSIC #5090.3

December 15, 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 SECOND INTERIM ACTION OPERABLE UNIT 1  
FEASIBILITY STUDY REPORT, MARINE CORPS AIR STATION (MCAS) EL  
TORO**

The Department of Toxic Substances Control (DTSC) has not completed its review of the above mentioned report dated October 15, 1995. This report addresses the Interim Action Feasibility Study for Operable Unit I. Attached are the Regional Water Quality Control Board, Santa Ana Region comments.

The attached comments are in addition to those provided on November 21, 1995. 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  
December 15, 1995  
Page 2

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

COMMENTS ON THE DRAFT OPERABLE UNIT I INTERIM-ACTION FEASIBILITY STUDY REPORT FOR THE MARINE CORPS AIR STATION EL TORO

General Comments:

- 1.) This OUI Interim Action Feasibility Study addresses the TCE and benzene plumes associated with MCAS El Toro. It is the DTSC's position that until such time as the sources are remediated both in the soils, specially the hot spots associated with the soils and the shallow aquifer hot spots, it may prove to be ineffective to pump and treat the deeper aquifer. Please consider the development of an additional alternative to evaluate hot spot removal for both onsite soils, shallow aquifer pump and treat and monitoring of the deeper aquifer.
- 2) The Base Closure Team (BCT) has agreed to do four rounds of ground water monitoring to better define the current conditions in both the shallow and deep aquifer. The data from which the IAFS was developed is from 1993-1994 and is based on only two rounds, which in some cases contradict, and extensive ground water modeling.. It makes sense to implement the four rounds of groundwater monitoring, evaluate the results and determine the need for deep aquifer restoration in the future. Meanwhile, the obvious problems can be addressed with the limited funds available at this time.
- 3) It is unclear, at this time, which of the alternatives in addressed in chapter 7, detailed analysis, will be selected. Please state the criteria clearly in the draft final IAFS.
- 4) The DTSC would like to discuss the merits of installing additional multi-port monitoring wells. Please notify myself and the Geologic Services Unit (GSU) representative when these discussions will take place.
- 5) The DTSC would like to re-iterate our November 21, 1995 comment: It is imperative that the shallow aquifer extraction system be completed and operational prior to the initiation of the IDP or any other principal groundwater treatment system.
- 6.) It is unclear which portion of the IDP treatment system is considered onsite or offsite for the purpose of ARARs analysis.
- 7) The DTSC's prior submittal, which include the Draft Regional Water Quality Control Boards comments, are attached.

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

Region 4  
245 West Broadway, Suite 425  
Long Beach, CA 90802-4444  
(310) 590-4868

November 21, 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:

**PRELIMINARY REVIEW COMMENTS ON THE SECOND INTERIM ACTION OPERABLE  
UNIT 1 FEASIBILITY STUDY REPORT, MARINE CORPS AIR STATION (MCAS) EL TORO**

The Department of Toxic Substances Control (DTSC) has not completed its review of the above mentioned report, dated 15 October 1995. This report addresses the Interim Action Feasibility Study for Operable Unit I. Attached are the Regional Water Quality Control Board, Santa Ana Region comments.

The following preliminary concerns were requested by the Navy and are not to be considered complete:

- 1) The DTSC strongly believes that it is imperative that the shallow extraction wells are in place and operational prior to the deep wells being extracted.
- 2) The DTSC recommends that the data obtained during Phase II of Operable Unit 2 be evaluated and incorporated into the screen placement of the shallow soils.
- 3) Comments which are provided by the Regional Water Quality Control Board or the EPA will not be incorporated at this time.

There will be additional comments provided by the due date of December 15, 1995. We look forward to working with you on these and other issues. Feel free to contact me at (310) 590-4919.

Sincerely,

A handwritten signature in black ink, appearing to read "Juan M. Jimenez".

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

Enclosures



*Mr. Joseph Joyce*  
*November 21, 1995*  
*Page 2*

Mr. Joseph Joyce  
November 21, 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  
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Mr. Vish Parpiani  
Environmental and Safety  
Marine Corps Air Station-El Toro  
P. O. Box 95001  
Santa Ana, California 92709

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

111 N. GRANDVIEW AVENUE  
LENDALE, CA 91201  
181 551-2800



## MEMORANDUM

TO: Juan Jimenez  
AHSS

FROM: Roy Yeaman

DATE: November 20, 1995

SUBJECT: COMMENTS ON CHAPTER 2 AND APPENDIX B OF OU-1 IA/FS  
REPORT

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## CHAPTER 2

Pages 2-5, 2-6

The text refers to several wells which are not listed in Table 2-1, page 2-19. Table 2-1 appears to be incomplete as reference in the text.

## APPENDIX B:

Page B1-3

Please note that guidance documents are issued for "consistent" interpretations in applying State law and regulations. Guidance documents clarifies the State's position. The state TBC's may in effect be State ARAR's.

Page B1-19

In the way I read Figure B1-1, the asterisks might go better after the categorical words "Onsite" and "Offsite".

Page B2-9

The issue is identifying your waste. Is your waste the plume or is it a discreet pumping volume? You may want to consider that the waste is the plume and therefore an average concentration might be appropriate. The statement of blending a volume of hazardous water with non-hazardous water does not make the waste no longer hazardous. Dilution does not make the waste non-hazardous for regulatory management purposes.

Juan Jimenez  
November 20, 1995  
Page 2

Page B4-8

Please note that even though WE do not expect any nuisance in implementing a plan, the DON still can be held accountable for nuisance. I just want to make clear that phrases like "Rule 402 is not an ARAR" refers sometimes to the idea that the DON is in compliance and not expected to be out of compliance.

State of California

Post-It™ brand fax transmittal memo 7671		# of pages ▶
To Mr. JUAN JIMENEZ	From L. VITALE	
Co. DTSC	Co. RWQCB-8	
Dept. OMF	Phone # 8-632 4998	
Fax # 3-635-4932	Fax # 9 909 781 6288	

# Memorandum

**To:** Mr. Juan Jimenez  
 Department of Toxic Substances Control  
 Office of Military Facilities  
 245 West Broadway, Suite 425  
 Long Beach, California 90802-4444

**Date:** November 20, 1995

**From:** CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION  
 2010 IOWA AVENUE, SUITE 100, RIVERSIDE, CALIFORNIA 92507-2409  
 Telephone: CALNET 632-4130 Public (909) 782-4130

**Subject:** COMMENT ON THE DRAFT OU-1 INTERIM-ACTION FEASIBILITY STUDY REPORT, MARINE CORPS AIR STATION, EL TORO

We have completed our review of the second Draft Operable Unit 1 Interim-Action Feasibility Study Report (Volume VII of OU-1 RI/IAFS) dated October 15, 1995, which we received October 16, 1995. We have the following general and specific comments to be incorporated with other State comments and forwarded to the Marine Corps.

## General Comments

# DRAFT

~~At this point, we have not drafted general comments, although we are considering including them.~~

## Specific Comments

1. In discussing waste classification per Title 22 of the California Code of Regulations (22 CCR) with in Section B1.4 (example; disposal of spent granular activated carbon), in choosing an example of wastes derived from treatment of groundwater or vapors resulting from groundwater treatment that may be hazardous or nonhazardous depending on toxicity. However, if the waste is nonhazardous, it could likely be classified as a designated waste per 23 CCR. We believe that 23 CCR, Article 2 is an appropriate ARAR.

2. Discussion within Section B2.1.1 Groundwater ARARs Conclusions appear to be premature. ~~The~~<sup>is</sup> discussion should be included in the context of application to a specific alternative. In addition, the selection of four substantive most stringent provisions includes Resource Conservation and Recovery Act (RCRA) groundwater protection standards. These standards which are contained in 22 CCR, Article 6

Comments on Draft OU-1  
Interim-Action FS

-2-

**DRAFT**

are applicable only to monitoring permitted facilities or for corrective action response. This implies that the groundwater cleanup is a RCRA response action resulting from a release from a permitted facility. It is interesting to note, that in subsequent sections of this document it is stated that RCRA standards are not applicable. If this is not a RCRA corrective action as we suspect, then the most stringent requirements for groundwater cleanup will be contained within the laws, regulations, and requirements administered by the State Water Resources Control Board (State Board) and Santa Ana Regional Water Quality Control Board (Regional Board).

b. We wish to note, that of the five criteria identified in Title 40 of the Federal Code of Regulations (40 CFR), Section 300.430(e)(2)(i), only two of the criteria are ever considered by Department of Defense installations. However, water quality criteria established under sections 303 or 304 of the Clean Water Act should be considered as equally as maximum contaminant level goals and maximum contaminant levels in determining final remediation goals

Comment 3. is on the Navy's interpretation of State Board Resolution 68-16:  
~~We are presently re-drafting the comment.~~

4. Identification of ARARs is an iterative process. As the proposal changes, as with this second Draft IAFS, it will effect the requirements which become ARARs. In a list and discussion of specific sections of the Porter-Cologne Water Quality Control Act (Porter-Cologne) identified as ARARs, we believe that Sections 13000[2], 13050(d), (f), (k), (l), (m), 13267(a), 13304(a), 13375, and 13377 should be additionally included.

5. In considering the provisions of the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan), Chapter 5 Implementation contains waste discharge prohibitions which we consider ARARs.

6. The purpose of State Board Resolution No. 68-16 is to protect high quality waters. It applies to the further or continuing migration of already polluted water (which will affect beneficial uses), as the bases for requiring control or cleanup of the pollution, unless it is not in the economic interest of the People of California.

7. As discussed in Comment 2, we believe that 22 CCR Section 66264.94 is not appropriate in addressing cleanup goals. Therefore,

**DRAFT**

Comments on Draft OU-1  
Interim-Action FS

-3-

**DRAFT**

State Board Resolution No. 92-49 is the ARAR appropriate to address cleanup goals for the interim action.

**DRAFT**

8. The Department of Navy's argument and determination that 22 CCR requirements are more stringent than State Board Resolution 92-49 is flawed in that the 22 CCR requirements are not applicable to this situation (Comment 2). Therefore, State Board Resolution 92-49 is the appropriate ARAR.

9. An additional ARAR for injection of treated water, Section 13264 of Porter-Cologne requires Waste Discharge Requirements (WDRs), are the substantive requirements contained in WDRs issued to the Navy for discharge of waste waters resulting from the base cleanup activities and actions.

~~There are at least five specific comments which have not yet been drafted.~~

For any questions on this review or related matters, please call me at (909) 782-4494.

**DRAFT**

Lawrence Vitale  
DoD Program

# Memorandum

MJA  
LV

**To:** Mr. Juan Jimenez  
Department of Toxic Substances Control  
Office of Military Facilities  
245 West Broadway, Suite 425  
Long Beach, California 90802-4444.

**Date:** December 11, 1995

**From:** CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION  
2010 IOWA AVENUE, SUITE 100, RIVERSIDE, CALIFORNIA 92507-2409  
Telephone: CALNET 632-4130 Public (909) 782-4130

**Subject:** COMMENTS ON THE DRAFT OU-1 INTERIM-ACTION FEASIBILITY STUDY  
REPORT, MARINE CORPS AIR STATION, EL TORO

We have completed our review of the second Draft Operable Unit 1 Interim-Action Feasibility Study Report (Volume VII of OU-1 RI/IAFS) dated October 15, 1995, which we received October 16, 1995. We have the following general and specific comments to be incorporated with other State comments and forwarded to the Marine Corps.

### General Comments

Because this proposal is for an interim action, it may be more appropriate to focus on action within or near the source area to prevent further contamination from entering the regional aquifer rather than consider the actions for the regional plume. Limited downgradient investigation of the regional aquifer has indicated that possibly most of the plume is at or below the proposed cleanup goals. Therefore, it is likely that the long term remedy for this component may be monitoring rather than an active remediation. Installation of an effective monitoring network during the interim action could expedite the implementation of the remedy, and possibly expedite re-use transfers.

### Specific Comments

#### 1. Section B1.6.1

In discussing waste classification per Title 22 of the California Code of Regulations (22 CCR) within Section 1.4.1 (last paragraph), please note that even if the wastes generated from treatment of groundwater (e.g., spent carbon) are classified as nonhazardous, they could likely be classified as designated wastes per 23 CCR.

Therefore, we believe that 23 CCR, Division 3, Chapter 15, Article 2 is also an appropriate ARAR.

2. Section B2.1.1 Groundwater ARARs Conclusions :

a. These discussions should be included in the context of application to a specific alternative. One of the substantive provisions included in this section is the Resource Conservation and Recovery Act's (RCRA) groundwater protection standards. These standards, which are contained in 22 CCR, Division 4.5, Chapter 14, Article 6, are applicable to monitoring of permitted facilities or for corrective action response from a regulated facility. This implies that the groundwater cleanup is a RCRA response action resulting from a release from a permitted facility. It is interesting to note, that in subsequent sections of this document, it is stated that RCRA standards are not applicable. If this is not a RCRA corrective action, then the most stringent requirements for groundwater cleanup contained within the laws, regulations, and requirements administered by the State Water Resources Control Board (State Board) and Santa Ana Regional Water Quality Control Board (Regional Board) are applicable.

b. We wish to note that of the five criteria identified in Title 40 of the Federal Code of Regulations (40 CFR), Section 300.430(e)(2)(i), only two of the criteria are ever considered by Department of Defense installations. Water quality criteria established under sections 303 and 304 of the Clean Water Act should also be considered in determining final remediation goals.

c. We cannot agree with an interpretation of State Board Resolution No. 68-16 by the Department of the Navy as presented in Section B2.1.1. The Navy recognizes in the discussion that their interpretation is not consistent with the State Board's interpretation. We cannot, and will not agree to allowing anyone to continue to pollute waters of the State from continued migration of already contaminated groundwater.

3. Section B 2.2.2.1, Water Quality Objectives and Related Requirements:

a. Porter-Cologne Water Quality Control Act - Identification of ARARs is an iterative process. As the proposal changes, as with this second Draft IAFS, the ARARs requirements will also change.

In the list and discussion of specific sections of the Porter-Cologne Water Quality Control Act (Porter-Cologne) identified as ARARs, Sections 13000[2], 13050(d), (f), (k), (l), (m), 13267(a), 13304(a), 13375, and 13377 should also be included.

b. Comprehensive Water Quality Control Plan for Santa Ana River - In the lengthy discussion under our Basin Plan, the Navy discusses the regional problem of total dissolved solids (TDS) and nitrates. The discussion concludes with statements that we support the position that TDS and nitrates are not chemicals of concern for the Navy. Our position is that, on site, if the Navy has not contributed to the TDS and nitrate pollution or if the pollution is naturally occurring, then the Navy is not responsible for abating that pollution.

The Water Quality Control Plan for the Santa Ana River Basin (Basin Plan), Chapter 5 (Implementation) contains waste discharge prohibitions which are ARARs.

c. Please modify the second sentence of the last paragraph on page B 2-14 to make it clear that Order No. 77-13 is the order issued by the State Board in response to Mr. Bayless' petition to review Regional Board Order No. 76-4.

d. Resolution No. 68-16 - The purpose of State Board Resolution No. 68-16 is the continued maintenance of high quality waters of the State. As stated in our comment 2.c., above, this resolution requires control and/or cleanup of groundwater contaminant plumes.

e. SWRCB Resolution No. 92-49 - As discussed in Comment 2, we believe that 22 CCR, Section 66264.9 is not appropriate in addressing cleanup goals. State Board Resolution No. 92-49 is the ARAR appropriate to address cleanup goals of the interim action. The Department of Navy's argument and determination that 22 CCR requirements are more stringent than State Board Resolution 92-49 is not accurate in that the 22 CCR requirements are not applicable to this situation (Comment 2.c.). State Board Resolution No. 92-49 is the appropriate ARAR.

f. Resolution of ARARs Affecting Injection of Treated Groundwater - Please note that substantive requirements of Waste Discharge Requirements per Section 13264 of Porter-Cologne would be another applicable ARAR for injection.

4. Section B.2.2.5, 23 CCR Division 3, Chapter 16

This section states that chemicals of concern (listed in Section C2.) are believed to be associated with fuel releases from underground storage tanks. Therefore, the corrective action requirements contained in 23 CCR, Division 3, Chapter 16, Article 11 are ARARs.

5. Section B2.2.2.7, General Groundwater Cleanup

As stated in Comment 3.f., above, substantial requirements of the General Groundwater Cleanup permit should be considered as ARARs.

6. Table B2-3, Page B2-36

According to the information we have from the State Department of Health Services, Standards and Technology Unit, the California Maximum Contaminant Level for toluene is 0.15 mg/l. However, please note that the limits specified in the General Groundwater Cleanup Permit, which is based on best available technology, is lower than the MCL and should be used as the appropriate ARAR.

7. Section B3.2, State

The Basin Plan is a location-specific ARAR. It contains beneficial use designations and subbasin water quality objectives.

8. Section F.2, Groundwater Discharge Options and Evaluation

Section F.2.1 discusses the options for discharge of extracted and treated groundwater. No discussion of ARARs is included in this section. However, most of the actions discussed are activities which are regulated by the Regional Board. We have the following brief comments regarding the 10 options:

- 1 - (discharge to local purveyor) must meet the purveyor's requirements
- 2 - (injection) must meet substantive requirements of Waste Discharge Requirements (WDRs)
- 3 - (off-base land application) requires WDRs, otherwise meet substantive requirements of WDRs
- 4 - (reclaimed water) must meet requirements of Irvine Ranch Water District
- 5 - (spreading basin) must meet the same requirements as

injection option, WDRs or substantive requirements of WDRs.  
6 - (brine line) must meet requirements of brine line operating agency  
7 - (POTW) must meet requirements of the POTW to discharge into the publicly owned treatment works.  
8 - (surface in washes) for discharge into the Waters of the United States, the Clean Water Act requires a National Pollutant Discharge Elimination System (NPDES) permit, which is issued by the Regional Board.  
9 - (basin recharge in washes) discharge requires NPDES permit.  
10 - (off-base evaporation) requires WDRs, otherwise meet substantive requirements of WDRs. Permits, or other substantive requirements for air emissions and surface impoundments may be also required.

9. Section G

In proposing to install a monitoring network in phases, please remember that this is a closing base. For property transfer, the remedy must be in place and demonstrated as effective for at least one year. Re-use requirements must be considered prior to and/or during remedial design.

10. Section J.

We agree with some of the findings in this section regarding the lack of groundwater monitoring data, water level data, performance (pumping, slug) test data, hydraulic conductivity data, etc. To the extent practicable, these uncertainties should be minimized to design a cost effective and reliable remedial system.

For any questions on this review or related matters, please call me at (909) 782-4998.

  
Lawrence Vitale  
DoD Program

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4  
245 West Broadway, Suite 425  
Long 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: Geologic Support Unit  
245 West Broadway, Suite 425  
Long Beach, California 90802

DATE: 13 December 1995

SUBJECT: COMMENTS ON *REMEDIAL INVESTIGATION/FEASIBILITY STUDY DRAFT OPERABLE UNIT 1 INTERIM-ACTION FEASIBILITY STUDY REPORT, VOLUME VI (APPENDIX A), MARINE CORPS AIR STATION (MCAS) EL TORO, CALIFORNIA*

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**Introduction**

The Geologic Support Unit (GSU) of the Department of Toxic Substances Control (DTSC) has reviewed the document entitled *Remedial Investigation/Feasibility Study Draft Operable Unit 1 Interim-Action Feasibility Study Report, Volume VI (Appendix A), Marine Corps Air Station (MCAS) El Toro, California* (Report), dated October 1995. The Report was prepared by Southwest Division, Naval Facilities Engineering Command, in conjunction with CH2M HILL.

Below are comments (marked with an asterisk) referring to the document entitled *Response to Comments Regarding Draft OU-1 Interim-Action Feasibility Study Report* (Response document) dated 01 September 1994 submitted by the Navy. Some of the responses in the Response document have not been adequately addressed. Following the discussion on the past comments are a few additional general comments on the Report. In the future, when referencing documents as a response to comments, please include the document name and the section number.



General Comments

- \*1. Comment of DTSC (J. Jimenez), P.1, C.1; Is the response implying that the shallow zone extraction wells will primarily be designed and located with hydraulic control factors in mind and a secondary purpose would be for mass removal? Also, what mechanism will be implemented to insure that shallow zone extraction network will be designed using recent OU-2 field investigation data.
- \*2. Comment of DTSC (J. Jimenez), P.2, C.3; See Comment \*1.
- \*3. Comment of DTSC (J. Jimenez), P.2, C.3; It is not clear what "DON concurs" implies. Provide how this concern will be addressed.
- \*4. Comment of DTSC (R. Ramanujam), P.6, C.A-2; The response states "...We agree that long-term aquifer pump tests should be performed for each of the defined unit during the Phase II RI to obtain representative values of K."

GSU is not aware of plans to preform long-term pump test for each of the defined units (shallow and principal aquifer, and the intermediate horizon). Does the Navy have future plans for such activities? If so, is the Navy planning on integrating the results into the groundwater model?

- 5. Please insure the shallow aquifer extraction well network located in the VOC source area is built and operational before the principal aquifer extraction wells are operational, if this applies to the selective alternative.
- 6. Use the subsurface data collected during the VOC source area investigation to design the extraction well in the shallow aquifer. The *Report* suggests the shallow aquifer wells will be built with a screen length of the presumed saturated thickness, about 100 feet. GSU recommends focusing the screened interval on the lithologic sections that are identified by the CPT data as contaminated. Additionally, Hydropunch data could not be collected from clay and silt beds because of low to no groundwater yield. Based on the CPT and Hydropunch information it is unlikely that the shallow zone extraction wells will yield the modeled discharge rates.
- 7. Section 3.1.1.4, Page A3-6; Please state in the text the interpreted thickness (range) of the intermediate horizon.
- 8. Section 6.2.1, Page A6-9; Use the most recent production flow rate (seasonal pumping) data available for the No Action Alternative or provide rationale why 1991 data was used.

Mr. Juan Jimenez  
13 December 1995  
Page 3

Recommendation

Most of the regional plume located in the principal aquifer is at or below proposed cleanup levels, based on the 1992 and 1993 RI groundwater water quality sampling events. The highest VOC concentration measured from the RI water quality data within the principal aquifer is 34 ppb. Much of the plume depicted in the *Report* (Figure 3-26, data from June to December, 1993) is below the TCE MCL of 5 ppb. Because this is an interim action feasibility study GSU recommends focusing active remediation efforts on the VOC source area (Site 24) to prevent further migration into the principal aquifer simultaneously installing a monitoring network as a long term remedy.

If you have any questions concerning this review please contact me at CALNET 8-635-5528 or 310-590-5528.



Sherrill Beard, RG  
Geologist  
Geological Support Unit



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