

Department of Toxic Substances Control



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MCAS EL TORO
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Winston H. Hickox
Secretary for
Environmental
Protection

August 12, 1999

Mr. Dean Gould
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
P.O. Box 51718
Irvine, California 92619-1718

COMMENTS ON THE TECHNICAL MEMORANDUM PROGRESS REPORT, PHASE I VADOSE ZONE REMEDIATION ACTIVITIES, SITE 24, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject report (Progress Report), dated July 1999. The Progress Report describes start-up and testing activities that were conducted during late May 1999 through the end of June 1999. The Department has also participated in a conference call on July 26, 1999 and discussed the status of the SVE-system and its monitoring. Participants in the conference call were Messrs. Dave DeMars, Crispin Wanyoike, Bill Sedlak, Laszlo Saska, and myself.

An important issue that surfaced during the conference call and following the review of the July Progress Report was the frequency of monitoring of the SVE wells. The field sampling and monitoring schedule implemented beginning on 17 May 1999 was not consistent with that proposed in both the System Evaluation and Optimization Report (SEOR) (Table 5-3, page 5-15) and the Sampling and Analysis Plan (SAP) (Table 3-1, page 3-2), both of which proposed the daily monitoring of the operational SVE wells for the first week. As a result, the proposed daily samples that would have shed light on the first weekly concentration levels in the SVE wells were not collected. Unfortunately, the start-up sampling opportunity is now lost, and cannot be reproduced unless the SVE system is shut-down for a lengthy period. This is not in the best interest of the remediation of the site. DTSC is disappointed that a deviation from the agreed upon sampling schedules has occurred, but urges the remediation staff to ensure future compliance with all approved action items.

The conference call participants also discussed the contents of Table 2-2 on page 2-7 of the Progress Report. It has been agreed by the participants that vacuum and flow rate measurements from individual SVE wells will not be shown as an average value, but as actual



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weekly measurements. Table 2-2 in the July Progress Report will be revised to reflect this revision and resubmitted in the August Progress Report.

DTSC would like to request that the electronic spreadsheet version of the sampling and monitoring data be transmitted to DTSC on a regular basis. Please e-mail the spreadsheets to Mr. Laszlo Saska at *LSaska@dtsc.ca.gov* and to myself at *TMahmoud@dtsc.ca.gov*.

Also, DTSC appreciates the efforts undertaken by the Navy in scheduling conference calls on a regular basis. Conference calls help all participants stay abreast of the status of site remediation, they are an excellent forum to resolve any issues, and they build consensus and cooperation among all participants.

As before, DTSC continues to value the opportunity to comment on the various on-going activities and to work cooperatively towards the eventual cleanup of the site. If you have any questions, please call me at (714) 484-5418.

Sincerely,



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Remedial Project Manager
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