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MCAS EL TORO
SSIC #5090.3

City Manager's Office

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November 26, 2001

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U.S. Environmental Protection Agency
Region IX
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RE: Additional comments on Draft Technical Memorandum, Building 307

Dear Ms. Moutoux, Ms. Chesney, Ms. Hannon, and Mr. Gould:

I am writing to you with additional comments on the recently released "Draft Technical Memorandum, Preliminary Assessment, Building 307, Marine Corps Air Station (MCAS), El Toro, California" (22 October 2001). We recognize that these additional comments come after the deadline for response, but we hope you will consider them.

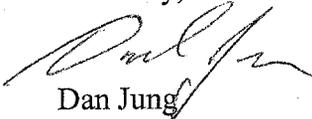
Briefly, in our previous comments, we argued that CFC-113 (also known by DuPont's trade name as Freon-113) should be considered a primary constituent of concern due to its use as a dry cleaning solvent while the laundry facility was in operation. We noted that at location 23, the

samples are consistent with a CFC-113 leak where the mass has partially volatilized to air, with the remaining quantity moving towards groundwater. And we urged that the results of the sampling not be considered conclusive evidence for the integrity of the piping and sewer system associated with Building 307 or any other location at MCAS El Toro based on these results.

We urge you to consider the results of the Round 13 of the Groundwater Monitoring program. Results presented in the "Final Groundwater Monitoring Report, February 2001 Monitoring Round 13" (October 22, 2001) support our previous comments. In particular, please review the sampling results for monitoring well *12DBMW-48A* located on Site 12, the former wastewater treatment facility. At that location, sampling identified a concentration of 210 µg/l in groundwater. Other wells where CFC-113 was detected cross gradient (to the east) to that site indicating that potentially the contamination at Site 12 is from a different source. This finding is consistent with a CFC-113 leak from the piping and sewer system and provides an explanation for the sampling results obtained during the investigation of Building 307.

We urge you to include the results of Groundwater Monitoring Round 13, as well as any subsequent groundwater monitoring results, in the analysis for the Draft Technical Memorandum and again urge you to consider that these findings are indicative of the piping and sewer system as a source for VOCs.

Sincerely,



Dan Jung

Director of Strategic Programs

Cc: Allison Hart, City Manager
Michael S. Brown, Michael S. Brown and Associates
Marcia Rudolph, MCAS El Toro RAB
Greg Hurley, MCAS El Toro RAB
