

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

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M60050_004133
MCAS EL TORO
SSIC NO. 5090.3.A

June 23, 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 REVISED FIELD SAMPLING PLAN, PHASE II,
REMEDIAL INVESTIGATION/FEASIBILITY STUDY (FSP), MARINE CORPS AIR
STATION (MCAS) EL TORO**

The Department of Toxic Substances Control (DTSC) has completed its review of the above mentioned Work Plan. General and specific comments are enclosed. These are in addition to the comments previously submitted by the DTSC.

DTSC will be available for a comment resolution meeting(s) either in person or via a telephone conference as necessary.

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
Base Closure Unit
Office of Military Facilities

Enclosures

cc: See next page.



RECYCLED PAPER

Mr. Joseph Joyce

June 23, 1995

Page 2

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DRAFT FIELD SAMPLING PLAN FOR MCAS EL TORO PHASE II RI/FS
Comments by Greg Holmes
25 May 1995

GENERAL COMMENTS

1. Analysis of existing data from Phase I RI is not included in the El Toro Field Sampling Plan (FSP). A presentation of existing data is necessary for determining data gaps and evaluating sampling rationale, including proposed sample locations and numbers of samples. Such data are not included in the draft Phase II RI Workplan, nor in the draft QAPP.
2. Tier 1 sampling designs and the process by which Tier 2 sample locations will be selected are not included in the FSP; rather, they are located in the draft Phase II RI Workplan. The FSP should be a stand-alone document which can be used in the field without having to refer back to other documents.

SPECIFIC COMMENTS

1. *Page 1-1, Section 1.2, third sentence:* "This FSP presents the sampling procedure for collecting the necessary information..."

The introduction does not specifically state what the "necessary information" is .

2. *Page 2-4, first paragraph, line 7:* "The second site was."

The second site was what?

3. *Page 4-11, Section 4.2:* "...and objectives of the Phase II RI/FS (Tables 4-1 and 4-2)."

Tables 4-1 and 4-2 do not describe affected media or objectives; they only list COPCs.

4. *Page 5-3, Table 5-2*

Use of a scintillometer is proposed for field screening at four sites; however, radio nuclides are listed in Table 4-1 (page 4-7) as COPCs at seven sites. Please explain this discrepancy.

5. *Page 6-16, Section 6.4.1:* "Installation of Monitoring and Extension Wells".

Please change "extension" to "extraction".

6. *Page 6-41, last paragraph*

Please describe the sampling device to be used for collecting soil gas samples after purging.

7. *Page 6-49, first paragraph*

Describe how the Tedlar bags will be filled. Also, describe QC procedures for Tedlar bags.

8. *Page 6-63, second paragraph from top*

When will real-time monitoring be required (as opposed to discrete)? Please explain in relation to COPCs and analysis to be used.

9. *Page 6-63, Section 6.8.4, second paragraph*

Air Resources Board (ARB) ambient air sampling guidelines cited in this section are not listed in References (Section 8), but it is presumed that the document referred to is "Testing Guidelines for Active Solid Waste Disposal Sites" (December 1986). The ARB no longer uses or recommends use of this document. It has been replaced with "Landfill Gas Testing Program Data Analysis and Evaluation Guidelines" (September 1990), in which Appendix C-1 "Recommendations for Further Testing" would be applicable here. According to ARB, the main difference between the two guidance documents is that the latter requires significantly lower detection limits which were not achievable when the earlier guidance was published.

10. *Page A1-1, Section 1.2*

Include use for surface elevation data which will be collected from all sampling points (Section 6.1).

11. *Page A4-2, Section 4.2.2.1*

Grids are not shown on Map A3-2.

12. *Page A4-3, last paragraph, second sentence*

This sentence does not make sense.

13. *Page B-2, Section 1.2, second bullet, last sentence*

The presence of what?

14. *Page B2-2, Section 2.2, paragraph below bullets, third sentence*

Should be "...recorded as less than the detection limit...".

15. *Page B4-4, Section 4.2.1.4 Flux Chamber Monitoring*

The method for determining the number and location of flux chamber samples is not explained.

16. *Page B5-2, Section 5.2.4*

SVOCs cannot be analyzed by GC alone; method 8270 requires GC/MS. At present there are three state-certified mobile laboratories for GC/MS. Such instruments are mobile, not portable.

17. *Page C5-3, Section 5.2.7*

Please note that TO-14 requires use of Summa canisters, not Tedlar bags.

18. *Page C5-4, Section 5.3.6, second sentence*

Should be "Retardation factors are helpful in understanding the contaminants...".

19. *Page C6-2, Section 6.4, last sentence*

Should be "Soil gas sampling procedures are described in detail in FSP Section 6.6."

20. *Page C6-2, Section 6.5, second paragraph*

Explain rationale for using angle borings instead of vertical borings. Also, what would be criteria for reducing sample intervals?

21. *Page O3-5, Map O3-2*

Should be titled "Suspended Fuel Tanks", not "Crash Crew Pit No. 2".

22. *Page (Q)3-5, Map Q3-2*

It does not appear that there will be two down gradient monitoring wells for Site 17, according to the estimated groundwater flow direction. Well #17_DGMW82 appears to be cross-gradient, not down gradient.

23. *Page W4-5, Section 4.2.1*

The depth of three mud-rotary borings is not stated, nor is it stated whether they will be backfilled after core samples are collected; please clarify.

24. *Page W6-6, third paragraph*

There is no Section 6.6.1.2. It should probably be 6.7.1.2.