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MCAS EL TORO  
SSIC NO. 5090.3.A

May 14, 1998

Cal/EPA

Department of  
Toxic Substances  
Control

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Cypress, CA  
90630-4700

Mr. Joseph Joyce  
BRAC Environmental Coordinator  
U.S. Marine Corps Air Station - El Toro  
P. O. Box 95001  
Santa Ana, California 92709-5001

Pete Wilson  
Governor

Peter M. Rooney  
Secretary for  
Environmental  
Protection

Dear Mr. Joyce:

**COMMENTS ON DRAFT COMPLIANCE MONITORING WELLS WORK  
PLAN, SITE 2 - MAGAZINE ROAD LANDFILL, MARINE CORPS AIR  
STATION (MCAS) EL TORO**

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated April 22, 1998, prepared by Bechtel National Inc. The work plan presents the rationale and methodology for installation of compliance monitoring wells as recommended in the Site 2 Feasibility Study. Due to budget considerations, the Department of Navy wishes to proceed with installation of the wells before the Record of Decision is signed.

This letter is to transmit the enclosed DTSC comments on the draft work plan. If you have any questions, please call me at (714) 484-5418.

Sincerely,

Tayseer Mahmoud  
Remedial Project Manager  
Base Closure Unit  
Southern California Operations  
Office of Military Facilities

Enclosure

cc: See next page.

**received**  
5/18/98

*Mr. Joseph Joyce*  
*May 14, 1998*  
*Page 2*

cc: Mr. Glenn R. Kistner  
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Mr. Gregory F. Hurley  
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**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**  
**Comments on Draft Compliance Monitoring Wells Work Plan**  
**Site 2 - Magazine Road Landfill**  
**Marine Corps Air Station El Toro**  
**Dated April 22, 1998**

**1. Section 2.1.2, Groundwater, page 2.2**

An adequate explanation of the elevated gross alpha/beta has not been provided. Please provide the results of the speciation sampling and analysis for radionuclides in groundwater from Round 6 and Round 7 groundwater sampling. Also, provide a response to Department of Health Services who provided comments on the Round 6 and Round 7 groundwater monitoring reports regarding radionuclides in groundwater. The information is needed before we can concur with your conclusions that gross alpha and gross beta activity is naturally occurring and does not originate from the landfill.

**2. Section 2.3, Groundwater Compliance Monitoring Network, page 2-2**

Reference to upgradient monitoring well "02NEW1" is a typographical error. The correct reference is "02NEW11". Also, check the fourth paragraph for typographical errors.

**3. Section 2.3, Fourth Paragraph and Figure 1-3**

The work plan indicates that a new monitoring well (replacing well 01NEW7) and one proposed well will be installed. However, Figure 1-3 shows the location of three new wells. Please clarify.

The proposed monitoring well adjacent to operational landfill Area A is discussed in the Feasibility Study (FS) for Site 2. Although not discussed in the FS, the second proposed monitoring well location between 02\_DGMW60 and 02\_DGMW59 would provide additional groundwater coverage downgradient of operational landfill Area B. Monitoring wells 02\_DGM60 and the replacement for 02NEW7 are downgradient from Area B; however, they are located close to the proposed line. It will be a good idea to install the second proposed well because of its location which provides an earlier indication of a release from Area B.

**4. Section 2.3, Groundwater Compliance Monitoring Network, page 2-3**

Reference to Local Enforcement Agency should be changed to Enforcement Agency according to the new Title 27.

*Comments on Draft Compliance Monitoring  
Work Plan for Site 2, MCAS El Toro  
Page 2*

**5. Section 3.5, Groundwater Sampling and Analysis, page 3-5**

Please explain why other analytes besides VOCs listed in Table E4-1 of the FS will not be tested for to establish baseline groundwater quality.

**6. Section 3.5.2, Laboratory Analyses, page 3-6**

See comment #5 above regarding the analytes to be tested for.