



# California Regional Water Quality Control Board

## Santa Ana Region



**Y Tamminen**  
Secretary for  
Environmental  
Protection

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**Arnold Schwarzenegger**  
Governor

M60050\_004332  
MCAS EL TORO  
SSIC NO. 5090.3.A

June 7, 2004

Base Realignment and Closure  
Attn: Mr. F. Andrew Piszkin, P.E.  
BRAC Environmental Coordinator  
7040 Trabuco Road  
Irvine, California 92618

### COMMENTS ON SITE ASSESSMENT REPORT, IRP SITE 16, FORMER MARINE CORPS AIR STATION, EL TORO

Dear Mr. Piszkin:

We have reviewed the above referenced document, dated March 30, 2004, which we received on May 17, 2004. We have the following comments:

- **Section 6.5 Target Levels, Pages 6-2 & 6-3:** The proposed method for calculating target levels involves risk exposure factors. The risk based cleanup approach for Installation Restoration Site 16 has been evaluated under the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA) and the Department of Defense Installation Restoration Program. The majority of the petroleum contamination at Site 16 is not a CERCLA contaminant. At petroleum release sites, our approach is normally based on the protection of designated beneficial uses and groundwater quality. Releases are evaluated and cleanup goals are based on the threat to, or potential threat to, water quality. We do not accept as appropriate the approach that you have outlined to determine target cleanup levels. Therefore, we do not accept as appropriate the proposed target soil cleanup levels for Site 16. Additionally, we do not accept their use as screening levels or cleanup goals at this petroleum product release site. Please remove this discussion from the document. If you wish to discuss cleanup goals, replace this section with a discussion of soil cleanup goals for gasoline, diesel and other applicable fuel related compounds based on the protection of beneficial uses and the water quality of this groundwater basin. Cleanup goals are normally proposed in a corrective action plan.
- **Section 6.7 Discussion of Model Results, Page 6-4:** Again, we will not accept a human health exposure scenario for evaluating the significance of contamination at a petroleum fuel release site. It should be noted that your model predicts that there will be adverse impacts to groundwater quality as a result of this petroleum release. Based on our review of the parameters utilized in running the model, we believe that the modeling likely understates those predicted impacts to groundwater quality. This finding is sufficient to support the necessity for corrective action at this site.

*California Environmental Protection Agency*



- Section **6.7 Discussion of Model Results, Evaluation of Results**, Page 6-5, Second paragraph: Your report recommends limiting the application of soil vapor extraction (SVE) to a few "local hotspots" based on the modeling and application of proposed target levels. We do not concur with this recommendation of limiting the application of SVE to a few hotspots. Your report recognizes, within the limited areas targeted for SVE, that the predicted magnitude of the impact to water quality depends on the percentage of the total petroleum hydrocarbon mass removed. Therefore, we would not concur with a limited approach to application of SVE in a corrective action plan for this site. If the proposed remedy for this petroleum release is SVE, then it should be efficiently implemented to reduce the maximum available mass of petroleum fuel and related compounds.
- Section **7.0 Discussion and Recommendations, Recommendations**, Page 7-2, first and second paragraphs: We disagree that sufficient information has been collected to narrow the implementation of a SVE system. This discussion centers on use of the proposed target levels and modeling results to support a recommendation on limiting the application of a remedy. As we have discussed in previous comments listed above, your proposed strategy is based on factors we do not agree with. When designing a remedy and drafting the corrective action plan, information specific to the remedy is usually collected and justified. You indicate an awareness of this approach in the text of your third paragraph of this Recommendations section. Additionally, data gaps in the characterization should be clearly identified, recognizing the need for additional sampling, and allowing you to complete a baseline characterization appropriate for the selected remedy.

For any questions, please call me at (909) 782-4494, or send e-mail to [jbroderic@rb8.swrcb.ca.gov](mailto:jbroderic@rb8.swrcb.ca.gov).

Sincerely,

  
John Broderick  
SLIC/DoD Section

cc: Ms. Nicole Moutoux, US EPA, Region 9  
Mr. Tayseer Mahmoud, DTSC, Office of Military Facilities  
Mr. Marc Smits, NAVFACENGCOM, Southwest Division