California Regional Water Quality Control Board
Santa Ana Region

Linda S. Adams
Secretary for Environmental Protection

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Arnold Schwarzenegger
Governor

June 1, 2006

Base Realignment and Closure
Attn: Mr. Darren Newton
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, California 92618

COMMENTS ON INFORMATION PACKAGE, FORMER UNDERGROUND STORAGE TANK (UST) SITE 154, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: T0605964530

Dear Mr. Newton:

We have reviewed the above referenced document, dated February 15, 2006, which we received on February 23, 2006. We have the following comments:

Former Building 154 was constructed in 1943 as a pump house for the original domestic water supply system and was demolished in 1971. UST 154 was a 280-gallon tank located adjacent to Building 154 and 1.5 feet below ground surface on a 2.5 foot wide slab. UST 154 was a fuel storage tank for the water pump housed in Building 154. The tank was most likely removed in 1971 when the building was demolished. The site is located in the southwestern section of the former base between the large water storage tank, Structure 174, and Building 435. It is adjacent to a paved road. Water production Well AW-2 is located 15 feet from the former UST site. The site was covered with metallic landing mat. It is also located within the boundary of Installation Restoration Site 24 volatile organic compound (VOCs) plume source area.

On April 13, 2005, an exploratory trench was located perpendicular to and north of the road at former Building 154 to determined whether the UST and piping had been removed. There was no evidence of the UST or associated piping. Petroleum impacted soil was discovered at seven feet below ground surface. The trench was completed to a depth of eight feet. The trench was back filled with the excavated soil. Water Well AW-2 was also located. In May 2005, six direct-push borings were advanced in the site vicinity during the investigation of PRL (potential release site)154. Either diesel or waste oil range petroleum hydrocarbons were detected in all six of the borings. Analytical results ranged from 4 mg/kg at 15 feet to 23 mg/kg at 20 feet for diesel and from 140 mg/kg to 48 mg/kg at 20 feet for waste oil range (or motor oil).

Assessment of the petroleum release continued with three exploratory trenches on January 19, 2006. Some odor was detected in the first and second trenches, but no

stained soil was observed. Petroleum contaminated soil was found in a limited area within the third trench at a depth of 7 to 11 feet along a concrete encased water pipe. Ten cubic yards of petroleum impacted soil was removed and stockpiled on site. Two confirmation samples were collected below the petroleum contamination at the base of the trench and analyzed for total petroleum hydrocarbons and VOCs. Gasoline was detected at 0.05 milligrams per kilogram in one sample and benzene, toluene, ethylbenzene, xylenes, and methyl tertiary butyl ether were not detected at or above reporting limits. The trench was backfilled with clean soil.

It should be noted that on January 19, 2006, a free product thickness of approximately 1 foot was measured in Well AW-2. Approximately six gallons of free product was removed from the well. Analytical results of the product were: TPH-WO (motor oil) 1,600,000 mg/liter (l); TPH-D 170,000 mg/l; TPH-G 120 mg/l; trichloroethylene 100 micrograms (µg/l)/l; naphthalene 89 µg/l; and 1,2,4-trimethylbenzene 73 µg/l.

We concur with your recommendation for further evaluation of the groundwater in the area of Well AW-2, which was based on the presence of free product in the well. It is likely remedial action is necessary for the source of the free product. We believe that further investigation or remedial action is not warranted for the very limited area of the former UST 154. Therefore, we believe that release at the former UST 154 site was a limited surface soil release that was removed during site assessment, that a significant release was not discovered, and that further action will not be required.

For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,

John Broderick
SLIC/DoD Section

cc via email: Ms. Lynn Hornecker, BRAC PMO WEST
Ms. Content Arnold, BRAC PMO WEST