



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

June 3, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
AC/S Environment (1AU)
MCAS El Toro
P. O. Box 95001
Santa Ana, CA 92709-5001

Re: U.S. EPA Comments on "Draft Evaluation of Perchlorate in Groundwater", Marine Corps
Air Station El Toro, CA

Dear Mr. Joyce:

The United States Environmental Protection Agency (EPA) has reviewed the above referenced document. I am attaching comments from EPA's hydrogeologist Herb Levine and an earlier e-mail memorandum from me dated February 2, 1999. This memorandum is still considered relevant by the regulatory agencies and our comments and recommendations need to be addressed in any "final" document for perchlorate and long-term monitoring.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Glenn R. Kistner".

Glenn R. Kistner
Remedial Project Manager
Federal Facilities Cleanup Branch

Attachments

cc: Patricia Hannon, RWQCB
Gregory Hurley, RAB Co-Chair
Tayseer Mahmoud, DTSC
Polin Modanlou, LRA
Andy Piszkin, SWDIV

Glenn Kistner

02/26/99 11:56 AM

To: fapiszkin@efdswest.navfac.navy.mil, jjjoyce@efdswest.navfac.navy.mil
cc: phannon@gwgate.swrcb.ca.gov, t.mahmoud@dtsc.ca.gov
Subject: perchlorate sampling in the longterm monitoring plan

Andy and Joseph:

Patricia, Tayseer and I conferred via phone today on the need for continuing perchlorate sampling as part of the longterm monitoring program fo El Toro. The water purveyors and the RAB have expressed concern over continued perchlorate monitoring and the regulatory agencies agree that it should be included in the longterm monitoring plan. After independent evaluation and then joint discussion we are recommending the following wells and sampling frequency for perchlorate:

Site 1 - MW 201 quarterly sampling for one year to establish a baseline, followed by semi-annual sampling.

Place two new monitoring wells downgradient of MW210 (the other nearby wells are not screened in zones similar to MW 201 thereby limiting their usefullness) screened in zones matching MW 201. Sampling to be carried out quarterly for one year, then semi-annually.

Site 3 - Well DGMW 64 - yearly sampling

Site 16 - Well 16 DBMW52 - yearly sampling

Site 18 - Well 18 DW135 - yearly sampling

Other areas - two wells screened in the shallow aquifer and one well screened in the deep aquifer located upgradient of the pumping station for the desalter. The navy can propose wells for this once pumping well locations have been established.

The above information needs to be included in the final longterm monitoring plan. Please feel free to contact us if you have any questions.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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75 Hawthorne Street
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May 24, 1999

MEMORANDUM

SUBJECT: Review of Draft Evaluation of Perchlorate in Groundwater, MCAS El Toro

TO: Glenn Kistner, RPM
Navy Section

From: Herbert Levine, Hydrogeologist 
Technical Support Team

I have reviewed the evaluation of perchlorate in groundwater document from the Navy and found it to be well written. This document provides an excellent assessment of the observance of perchlorate at groundwater wells on station and off station. The correlation between laboratories appears to be very good. I agree with the conclusions posed by the Navy and recommend that the EPA accept those conclusions. I would ask for some clarification regarding the recommendation for future monitoring. From reading Section 4 it looks as if the Navy will be making a change to the long term monitoring document to include perchlorate as an analyte for the locations outside of Site 1 and the four landfills. This could be stated more clearly and the Navy might want to consider sampling for perchlorate on a limited basis if after a determined time period the concentrations do not change or increase.