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MCAS EL TORO
SSIC # 5090.3

February 8, 1996

CODE 18

1996 FEB -9 PM 2: 05

William A. Dos Santos
Commander, CEC, U.S. Navy
Naval Facilities Engineering Command
1220 Pacific Highway, Room 135
San Diego, CA 92132-5187

Dear Commander Dos Santos:

This letter is in response to the comments issued in December 1995 by the U.S. EPA, the California Department of Toxic Substances Control, and the California Regional Water Quality Control Board regarding the Interim Action Feasibility Study for Operable Unit 1. Since those comments were issued, we received a copy of a letter of January 22, 1996 from Ms. Bonnie Arthur of the EPA to Mr. Joseph Joyce of MCAS El Toro, expanding on EPA's position from the December 15, 1995 letter. We at OCWD also had an opportunity to meet with staff of the three responding agencies on February 1, 1996 for further clarification regarding the above.

With this information, I am offering the following thoughts and recommendations of OCWD in an effort to get this vital process back on track.

Based on review of the January 22 letter and discussions on February 1, it is OCWD's understanding that the regulators are concerned with the cost of Alternative 2A. This alternative is the Department of the Navy's stand-alone project that pumps the contaminated water from the ground, removes the volatile organic compounds, and reinjects the water back into the ground. The regulators believe that it is too costly for the benefit received in terms of basin cleanup. However, we also understand the regulators agree that Alternative 6A is acceptable.

Alternative 6A, as you know, is the combined alternative that incorporates the remedial action and water use goals of both the Department of the Navy (DON) and OCWD. It is the alternative that DON was prepared to recommend and present to the public in its December 1995 draft document entitled "U.S. Marine Corps Proposed Plan or Interim Remedial Action to Clean Up Groundwater at MCAS El Toro." And lastly, it is the alternative that our staffs had agreed to in concept as the one that resulted in a "win-win" situation regarding cost, implementability, and providing a benefit to the impacted community in the form of cleaning up the basin and providing drinking water as an end product.

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With this in mind, it is strongly recommended by OCWD that DON not retreat and perform further alternative analyses that will take months to complete. Rather, we recommend that DON and OCWD meet again as soon as it can be arranged, to develop a response to the regulators that allows us to expeditiously proceed with Alternative 6A.

I look forward to hearing from you on this vital matter.

Sincerely,



William R. Mills Jr., P.E.
General Manager

c:

Congressman Christopher Cox
Congressman Robert Dornan
Ms. Bonnie Arthur, U.S. EPA, Region IX
Mr. Juan Jimenez, DTSC
Mr. James McConnell
Mr. Lawrence Vitale, RWQCB