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MCAS EL TORO  
SSIC #5090.3



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

October 2, 2001

BRAC Environmental Coordinator  
Base Realignment and Closure, Environmental Division  
Attn: Mr. Dean Gould  
P.O. Box 51718  
Irvine, CA 92619-1718

RE: Draft Work Plan, Aquifer Test, IRP Site 2, Marine Corps Air Station, El Toro, dated August, 2001

Dear Mr. Gould:

EPA has reviewed the above-referenced work plan for an aquifer test at IRP Site 2, Magazine Road Landfill. Please find our comments enclosed.

If you have any questions, please call me at (415) 744-2366.

Sincerely,

A handwritten signature in cursive script that reads "Nicole G. Moutoux".

Nicole G. Moutoux  
Project Manager  
Federal Facilities Cleanup Branch

Enclosures

cc: Don Whittaker, SWDIV  
Triss Chesney, DTSC  
Patricia Hannon, RWQCB  
Greg Hurley, RAB Community Co-Chair  
Marcia Rudolph, RAB Subcommittee Chair  
Ms. Polan Modanlou, MCAS EL Toro Local Redevelopment Authority

**received**  
10/9/01

## Comments on Draft Workplan for Aquifer Test, IRP Site 2, Magazine Road Landfill

### General Comments

1. Please provide an explanation for the long duration of the proposed pump test(6 months). It appears that with such a long testing period in conjunction with locating the testing wells in the highest concentration areas of the plume, that much of the groundwater contamination may be addressed.
2. Given that perchlorate has been detected in several wells, it should be added to the analyte list.

### Specific Comments

1. Pg 3-2, Table 3-2: The Navy should consider sampling all wells, not just those listed on Table 3-2, for Natural Attenuation parameters.
2. Pg 3-10, Section 3.2.4, Piezometer Construction: Please consider making the piezometers 2" diameter so that sampling ports can be installed.
3. Pg 3-11, Section 3.2.5, Aquifer Test: The Navy should consider collecting samples weekly for VOC analysis instead of monthly.
4. Pg 3-7 and 3-8, Section 3.1.3 and Table 3-4: In the last paragraph on page 3-7, the Navy states, "The proposed extraction and observation wells, pumping scenario, and approximate distances from pumping to observation wells are listed in." It appears that this should say listed in Table 3-4. In looking at Table 3-4, it is unclear why certain wells were chosen as observation points. Please provide such rationale.