



# California Regional Water Quality Control Board

## Santa Ana Region



**Winston H. Hickox**  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb8>  
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October 17, 2001

M60050.002765  
MCAS EL TORO  
SSIC #5090.3

Mr. Dean Gould  
BRAC Environmental Coordinator  
Base Realignment & Closure, Environmental Div.  
P O Box 51718  
Irvine, CA 92619 -1718

### COMMENTS ON DRAFT WORK PLAN, AQUIFER TEST, IRP SITE 2, MAGAZINE ROAD LANDFILL, FORMER U. S. MARINE CORPS AIR STATION, EL TORO

Dear Mr. Gould;

We have completed our review of the above-referenced document, dated August 2001, which we received on September 4, 2001. Based on the information in the report, we have the following comments:

#### Field Sampling Plan

**1. Page 3-7 Section 3.1.3 Aquifer Test**

Please explain the basis for selecting the proposed pumping rate.

**2. Page 3-10 Section 3.2.4 Piezometer Construction**

Please provide a more detailed description of the proposed piezometers, such as the diameter of each borehole, the depth of borings, and the estimated length of well screen for each piezometer. We also request that you provide a proposed well construction diagram. The actual "as-built" well diagram should be included in the final report for the piezometer installation.

**3. Page 3-12**

In this section, you state that the discharge from Site 2 will meet the substantive requirements of general permit Order No. 96-18 (General Groundwater Cleanup Permit for Discharges of Extracted and Treated Groundwater, Resulting from the Cleanup of Groundwater Polluted by Petroleum Hydrocarbons and/or Solvents). Discharge Authorization No. 96-18-181 was issued by the Executive Officer of the Regional Board for discharges of treated wastewater at IRP Site 16. This discharge authorization does not authorize any discharge at Site 2. Furthermore, General Order No. 96-18 does not include an effluent limitation for perchlorate, and as such an individual permit would be appropriate for discharges from Site 2 where perchlorate was detected. In conducting the aquifer test at Site 2, a one-time discharge of treated wastewater will occur. If characterization of the treated effluent from Site 2 shows the absence of pollutants, issuance of waste discharge requirements (WDRs) for the discharge could be conditionally waived.

In order for Board staff to prepare the appropriate documentation for a waiver of WDRs, and issue an authorization for the one-time discharge of treated water from Site 2, you must provide additional

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**received**  
10/19/01

Mr. Gould

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details on the proposed treatment and discharge of the extracted groundwater. The following information must be submitted:

- A site map showing where the extracted water will be stored, treated and discharged;
- A detailed description of the treatment system, including a schematic drawing of the proposed system;
- The estimated volume of treated water expected to be discharged; and,
- A list of the chemical parameters that the extracted groundwater will be analyzed for, both prior to and after treatment, including laboratory detection levels for chemical analysis.

Be advised that Order No. 96-18 expired on October 1, 2001 and was administratively extended until a new General Permit is adopted by the Board. Meanwhile, the discharge from IRP Site 16 is allowed to continue as previously approved. The new General Permit is scheduled for consideration at the December 7, 2001 meeting of the Regional Board.

**4. Page 3-15 Section 3.5 Investigation-Derived Waste, Decontamination Water and Purged Groundwater**

This section describes the possible use of a decontamination pit for collection of equipment decontamination water; however, it does not describe how the pit will be constructed, or whether it will be lined with an impermeable membrane. Please provide the details of the proposed pit construction and usage.

**5. Page 4-11, Table: 4-2, Project Quality Control Criteria for Groundwater Samples**

Please explain how the values listed under column heading Project Decision Threshold will be used.

If you should have any questions, please call me at (909) 782-4498, or send e-mail to phannon@rb8.swrcb.ca.gov.

Sincerely,



Patricia A. Hannon  
SLIC/DoD/AGT Section

cc: Ms. Triss Chesney, Dept. of Toxic Substances Control  
Mr. Gregory F. Hurley, RAB Co-Chair, MCAS El Toro  
Ms. Polin Modanlou, MCAS El Toro Redevelopment Authority  
Mr. Don Whittaker, Naval Facility Engineering Command, SWDIV  
Ms. Nicole Moutoux, U. S. EPA, Region IX

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