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City Manager's Office

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February 23, 2001

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Dear Ms. Moutoux, Ms. Chesney, Mr. Broderick, and Mr. Gould,

I am writing to you with comments on the recently released "Draft Groundwater Monitoring Report June 2000 Monitoring Round 12" (12 January 2001). We appreciate the opportunity to provide comments on the draft. In general, the report is well organized and informative, but there are a number of areas where questions remain or clarifications should be made.

Executive Summary

1. Please explain what the mechanical difficulties with the Westbay sampling equipment were and, more importantly, why the sampling could not be delayed until the equipment was in working order. It is not particularly useful to present water level and analytical data for the principal aquifer from Round 11 (10 months previous) as characterizing current conditions

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during Round 12 sampling. Use of the Round 11 data may give a false picture of actual conditions during Round 12.

2. The lack of data points to configure the TCE plume for the principal aquifer for Round 12 is troubling. The City disagrees that the configuration of the TCE plume off the base has remained stable over time and believes that the data show that it is continuing to move westward.
3. There are no conclusions drawn about the significance of radionuclide levels consistently above the MCL for Sites 2, 3, and 5 and the hits above the MCL for Sites 17 and 24. We continue to believe that there may be a link between Sites 2 and 5. We also believe that the consistency of the hits above the MCL for radionuclides requires further action to identify and address the source.
4. What is the significance and is action required in response to elevated metal levels above the MCLs for manganese and nickel?

Section 2

1. Please clarify the specific reasons why the reduction in sampling sites from the GMP makes the Round more representative. We agree with the comments of the Technical Committee of the RAB made previously that reductions in sampling sites have made it difficult to establish significant trends at the base.
2. Please include a discussion of the mechanical difficulties with the Westbay sampling equipment and why the sampling could not be delayed until the equipment was in working order. It is critical to have a discussion of how the absence of data affects the validity of the results and conclusions of the GW monitoring round.
3. In Section 2.6, please explain the rationale for the limited sampling of metals and radionuclides from selected wells for the sites. Why not sample from all wells at the sites?

Section 3

1. Please explain whether or not sampling from seven monitoring wells is sufficient to have statistically valid conclusions about changes in principal aquifer characteristics.
2. Again, the use of Round 11 data to characterize current conditions may be misleading. No information is presented to be able to ascertain whether or not Round 11 data is valid for conditions at the time of the Round 12 sampling.
3. It would be most helpful to have a table in Section 3 that summarizes the trend data for wells where TCE has at any point been above the MCL and a corresponding figure. The trend data is of most interest to follow what is happening with the plume and to evaluate the progress of remediation efforts.

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4. In section 3.2.2, it appears that there is a typo--Table B.2C should read Table B.1C.
5. Please clarify the discussion of the TCE plume configuration. The language implies that Round 12 is comparable to Rounds 8-11 for both the shallow and principal aquifers, although data are only available for the shallow groundwater unit.
6. The final paragraph discussing the location and configuration of the principal aquifer VOC plume is irrelevant to this report since it presents data from previous rounds. No conclusion can be drawn about the configuration during the Round 12 sampling period.
7. Figure 3-3 is misleading since it provides a delineation of the principal aquifer VOC plume for Round 12 when no data exists to support the delineation. Either delete the principal aquifer characterization or make it explicit that it is based on previously collected data and may not represent conditions at the time of the Round 12 sampling period.

Section 4

1. What conclusions can be drawn regarding the success of the SVE program based on the relative stability of TCE concentrations in the shallow aquifer within the Site 24 VOC source area?
2. The discussion of Round 11 data as a substitute for the lack of Round 12 data regarding the principal aquifer is not informative of current conditions during the Round 12 sampling period and should be deleted.
3. What is the significance of the continued elevated levels of radionuclides, manganese, and nickel above MCLs for the remediation effort? In some of the monitoring wells, levels continue to rise. Does this indicate that any of the interim final RODs or draft RODs should be modified to address these findings?

Appendix B

1. Consider adding simple charts plotting concentration over time for wells with elevated levels above MCLs for TCE, PCE, radionuclides, and manganese and nickel. This will aid in understanding trends.

Thank you for the opportunity to provide comments on the draft. We look forward to the revised report.

Sincerely,



Daniel Jung
Executive Assistant

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