



Linda S. Adams
Secretary for
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California Regional Water Quality Control Board

Santa Ana Region

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MCAS EL TORO
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

March 11, 2009

Base Realignment and Closure
Attn: Ms. Debra Theroux (debra.theroux@navy.mil)
Deputy Base Closure Manager
7040 Trabuco Road
Irvine, California 92618

**RESPONSE TO PROPOSED CLOSURE STRATEGY LETTER FOR
MISCELLANEOUS SITE OF CONCERN B3, FORMER MARINE CORPS AIR
STATION, EL TORO
GeoTracker No. DOD100168600**

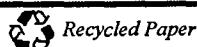
Dear Ms. Theroux:

We have reviewed your letter dated January 28, 2009, outlining the proposed closure strategy for Miscellaneous Site of Concern (MSC) B3, as discussed in the January 13, 2009 BRAC Cleanup Team meeting. As you know, in response to our comments on the B3 site closure request and report, you have planned an excavation at this site to remove as much of the near surface mass of petroleum hydrocarbons as possible. In order to complete that excavation, it will be necessary for you to decommission six groundwater monitoring wells that are currently used for the monitored natural attenuation (MNA) remedy for Installation Restoration Program (IRP) Site 16. The B3 Site is located within IRP Site 16. These sites are also located within a carve-out that is scheduled for transfer to private ownership during the current federal fiscal year.

Following completion of the excavation at the B3 Site, you are proposing to reinstall five monitoring wells to replace the six wells that are to be decommissioned. We can concur with replacing those wells as you plan; however, you would be placing six wells within in a small area, within approximately a 20 to 40 foot radius. We suggest that you install only two wells to replace the original six monitoring wells. We recommend that one well be drilled at the location of the highest historical recorded concentration of total volatile organic compounds (VOCs) measured at Site 16, and a second well placed just downgradient. The first well should be screened within the uppermost portion of the water table, with an appropriate screen length that would accommodate the anticipated fluctuations in groundwater elevation. The second well should function to indicate whether the VOC plume is migrating laterally or sinking.

We recognize that the suggested approach would require that you amend the MNA remedy for Site 16, but we believe that the long-term cost savings should warrant a discussion of the number and function of replacement wells.

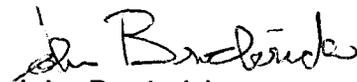
California Environmental Protection Agency



Therefore, we request that the Navy and the other BRAC Cleanup Team members consider this, or another alternative, to the originally proposed approach for replacing the six IRP Site 16 MNA wells in the excavation zone for MSC B3.

For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,


John Broderick
Site Cleanup/DoD Section

cc via electronic copy:

Richard Muza, U.S. EPA, Region 9 - muza.richard@epa.gov
Quang Than, Department of Toxic Substances - qthan@dtsc.ca.gov
Marc Smits, BRAC PMO West - marc.smits@navy.mil