

**IRVINE RANCH WATER DISTRICT**

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December 18, 1990

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Mr. Larry L. Nuzum
Remedial Project Manager
Southwest Division Naval Facilities
Engineering Command
Code 018C, 1220 Pacific Highway
San Diego, CA 92132-5190

Subject: Comments on Draft Work Plan, Sampling and Analysis Plan
and Community Relations Plan for MCAS El Toro Site

Dear Mr. Nuzum:

This letter presents the comments of Irvine Ranch Water District (IRWD) regarding the above-referenced documents. As you know, IRWD is a water district serving the City of Irvine and portions of Tustin, Santa Ana, Newport Beach and areas of unincorporated Orange County.

On behalf of the residents served by IRWD, I want to express my concerns that the surrounding area be addressed as quickly and thoroughly as possible. As described below, I am particularly concerned with the proposed timetable for addressing off-base contamination, the failure of the Work Plan to properly address groundwater contamination of the Magazine Landfill site, and the Work Plan's failure to discuss the Marine Corps' intentions in case an emergency response action becomes necessary.

I. Timetable

Under the proposed Work Plan, the Marine Corps will not actually begin to clean up the off-base contamination until August, 1995. The Marine Corps has been aware of the groundwater contamination problem since at least 1985. While I understand the need to thoroughly investigate the nature and extent of the groundwater contamination problem, I do not understand why the Marine Corps has delayed as long as it has and why it needs an additional 3 years to develop a plan of attack once the Remedial Investigation and Feasibility Study (RI/FS) is completed.

Mr. Larry Nuzum
December 18, 1990
Page 2

Moreover, I am advised that the delay between completion of the RI/FS and commencement of the cleanup is contrary to federal law. Certainly, we expect the Marine Corps to live up to its obligation to comply with all applicable federal, state, and local requirements.

Finally, I understand that the Marine Corps is considering deleting the timetable from the RI/FS Work Plan. I believe this would be a serious mistake. The schedule provides interested citizens with a yardstick by which they can measure the Marine Corps' progress towards the ultimate goal of cleaning up the site. Given that the deadline for commencing remedial action at the site is governed by statute, there does not appear to be any rational justification for withholding that date from the public.

- II. The Marine Corps must thoroughly investigate off-base contamination and take immediate action, if necessary, to protect public health, welfare, or the environment.

The Marine Corps has conceded that it is a source, if not the sole source, of the off-base groundwater contamination. As a result, the Marine Corps is obligated to thoroughly investigate the location of the groundwater plume and to take whatever steps are necessary to protect drinking water supplies.

I understand that the northwest edge of the TCE plume has not been adequately identified. Clearly, the groundwater contamination cannot be thoroughly evaluated until the scope of the problem is defined. I also understand that the Marine Corps anticipates constructing only shallow wells at the Magazine Road Landfill. Given the length of time for which the landfill was used and its proximity to the Borrego Canyon Wash, shallow wells will not adequately detect the extent of the contamination at Site 2. I urge you to consider constructing the deeper monitoring wells at that location.

Finally, and most importantly, I am concerned about whether the Marine Corps is committed to undertaking an emergency response action at the site, if it appears that the groundwater contamination may pose a threat to public health.

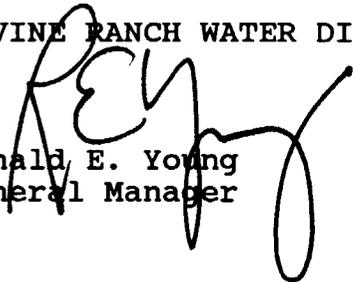
Mr. Larry Nuzum
December 18, 1990
Page 3

Nowhere does the Work Plan address such a contingency. To clarify the Marine Corps' position on this point, the Work Plan should be amended to describe the criteria that will be used in determining whether an emergency exists, the measures that will be taken in an emergency, and who will take them.

I look forward to working with you as you undertake the difficult task of investigating and remediating contamination at the site. The relationship between the Marine Corps and the Orange County community has always been a good one, and I am confident that we can continue to work together.

Yours truly,

IRVINE RANCH WATER DISTRICT



Ronald E. Young
General Manager

REY/RRM:kl

cc: William R. Mills, Orange County Water District