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MCAS EL TORO
SSIC #5090.3

November 26, 2001

Mr. Dean Gould
Base Realignment and Closure (BRAC) Environmental Coordinator
Environmental Division
MCAS El Toro
P.O. Box 51718
Irvine, CA 92619-1718

Subject: MCAS El Toro
Proposed Plan – Groundwater Cleanup
Operable Site 1/Site 18 & Operable Site 2A/Site 24

Dear Mr. Gould:

I attended the public meeting on November 13, 2001 where the Proposed Plan for Groundwater Cleanup of Operable Units 1 and 2A was presented. After listening to the presentation and reviewing the hand-outs, I have the following comments and questions:

1. As you are no doubt aware, groundwater cleanups of chlorinated solvent plumes in the San Gabriel and San Fernando Valley Groundwater Basins have been delayed due to the discovery of additional chemicals in the groundwater which require the use of different treatment technologies than are typically used for chlorinated VOCs. These compounds include perchlorate, NDMA, 1,4-dioxane, and hexavalent chromium. Have the shallow and deep groundwater plumes at El Toro been assessed for the potential presence of these compounds?
2. Reverse Osmosis (RO) is proposed for the removal of nitrate and TDS from groundwater prior to the removal of VOCs. Will the RO process remove any of the VOCs? If there will be any VOCs in the RO reject stream, the fate of these VOCs should be assessed, since I assume the RO reject stream will ultimately be discharged to the ocean. Also, since I understand that at least part of the RO reject pipeline will make use of an existing pipeline, this line should be leak checked and evaluated for compatibility with the RO reject.
3. The flow diagram for the preferred remedy indicates RO treatment of the VOC-contaminated groundwater, followed by VOC removal, disinfection, and then discharge to the non-CERCLA Irvine Desalter project for recycled water use. The flow diagram seems to imply that the CERCLA remedy groundwater will be desalted twice – once as part of the CERCLA remedy and again as part of the Irvine Desalter project. I believe that the TDS/nitrate removal for the Irvine

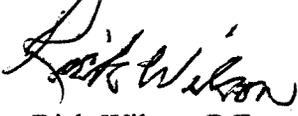
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Desalter is for non-VOC-contaminated groundwater, and that the CERCLA remedy groundwater will be blended with this groundwater before being distributed by IRWD for non-potable use. Perhaps the flow diagram could be revised to clarify this point.

Thank you for consideration of my comments.

Sincerely,

A handwritten signature in black ink that reads "Rick Wilson". The signature is written in a cursive style with a large initial "R".

Rick Wilson, P.E.