



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

M60050.002858
MCAS EL TORO
SSIC NO. 5090.3

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Ser 06CC.GB/0993
Sept. 20, 2002

Mr. John Broderick
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3339

Dear Mr. Broderick:

Subj: EL TORO IRP SITE 2 AQUIFER TEST.

On August 14, 2002, Navy representatives and the BRAC Closure Team (BCT) participated in a conference call to discuss issues related to El Toro IRP Sites 1 and 2. Ms. Patricia Hannon was unable to participate in the call. Subsequent to the BCT conference call held on August 14, 2002, our organizations have had difficulty getting together. Mr. Gordon Brown has indicated that he and Mr. Jim Sheetz spoke with Ms. Patricia Hannon on the phone September 5, 2002. This letter serves as a review for participants in the conference call; as a request relating to the Site 2 Aquifer Test; and as a primer for a conference call between the BCT, our staff, and you.

While the first set of issues during the conference call related to perchlorate in groundwater at El Toro Site 1, the second set of issues discussed during the conference call related to MCAS El Toro IRP Site 2 Aquifer Test. We need to resolve issues related to Site 2 frequency of sampling/analysis and with the discharge. As a result of Mr. Brown's and Mr. Sheetz's call with Ms. Hannon, we propose the following: Initially, rather than testing for Constituents of Concern (COCs) on a weekly basis, we propose to sample, analyze, and discharge on a per batch basis. Effluent from the aquifer test will be collected in Baker Tanks (21,000 gallon capacity). We will sample and analyze groundwater prior to pumping, and then sample the batch in the first of two Baker Tanks prior to treatment. If there is any volatilization occurring, this should enable us to identify that mechanism.

In the final step, we will sample following treatment (effluent in the second Baker Tank), and if it meets the criteria previously established in Appendix "C" of the Aquifer Test Work Plan, we will discharge the treated water into the Borrego Canyon Wash. (Additional discussion on discharge follows.)

When the volume of water to be discharged equals a Baker Tank a day, we propose to start discharging directly into the wash. At that point in time we propose to sample and analyze on a weekly basis. This should enable us to assure that the treatment system is functioning as designed, assist in the analysis of when breakthrough might occur, and contribute data in establishing a filter change-out schedule.

Thereafter, we propose to sample on a weekly basis up to the point where we arrive at the three-month mark. As we approach the three-month mark, we will request a review of the data, with the possibility of reducing the sampling frequency to bi-monthly.

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With the exception of selenium, it is proposed that sampling not be performed for additional metals. Ms. Hannon's concern for sampling and analysis for selenium was contingent on whether selenium is a natural component of the groundwater. We propose that we sample for Selenium in the initial groundwater samples and in the first Baker Tank load. If selenium does not exceed the Receiving Water Criteria 50μ , we propose that we only be required to sample and analyze for this constituent on a monthly basis.

In the first month of the aquifer test it is planned to pump from two wells at a rate of 5,700 gallons per day, for a total of 172,000 gallons for the month. In the second month we plan to pump from 4 wells with a total of 518,000 gallons for the month. In the third month and for the duration of the test, we plan to be pumping from 6 wells. In the third month we anticipate pumping 907,200 gallons. The fourth month volume of water is projected to be 1.4 M gallons, the fifth month 1.9 M gallons, and the sixth month 2.4 M gallons, or approximately 17,000 gallons per day.

With regard to the discharge into the Borrego Canyon Wash, we propose to use a 2-inch diameter perforated pipe approximately 10-feet in length. We will position it such that deleterious erosion is not present and extensions to prevent erosion will be installed as needed.

The schedule is such that the drilling and hydropunch operation at Site 2 should be completed by September 19th. Representatives of the Navy agreed to provide groundwater data to the BCT from the first round of sampling of completed wells and other existing wells that are being used to characterize the aquifer. This data will not have gone through the QA/QC process. After the BCT has had an opportunity to review the groundwater data, permission is to be granted to continue on with the aquifer test. We are asking for rapid turn around at this point in time. As the step-draw down test is to start following BCT approval, it is imperative that we resolve these issues as soon as possible.

Given the number and complexity of the issues, we feel a follow-on conference call will be valuable. Please let us know the dates that are compatible with your schedule, and we will coordinate with the other BCT members. Hopefully, we will be able to combine Site 2 issues with Site 1 during our BCT Meeting on the 25th of September. For Immediate questions or clarifications, please contact Mr. Gordon Brown at (619) 532-0791 or me at (619) 532-0765.

Sincerely,


for DEAN GOULD

Base Realignment and Closure
Environmental Coordinator
By direction of the Commander

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Copy to :

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