



# California Regional Water Quality Control Board

## Santa Ana Region



**n H. Hickox**  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb8>  
3737 Main Street, Suite 500, Riverside, California 92501-3348  
Phone (909) 782-4130 - FAX (909) 781-6288

**Gray Davis**  
Governor

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at [www.swrcb.ca.gov/rwqcb8](http://www.swrcb.ca.gov/rwqcb8).*

April 17, 2003

**M60050\_003608**  
**MCAS EL TORO**  
**SSIC NO. 5090.3.A**

Base Realignment and Closure  
Attn: Mr. F. Andrew Piszkin, P.E.  
BRAC Environmental Coordinator  
7040 Trabuco Road  
Irvine, California 92618-1700

### **COMMENTS ON DRAFT WORK PLAN, PRE-DESIGN INVESTIGATION FOR SHALLOW GROUNDWATER UNIT REMEDY, IRP SITE 24, VOLATILE ORGANIC COMPOUNDS SOURCE AREA, FORMER MARINE CORPS AIR STATION, EL TORO**

Dear Mr. Piszkin:

We have completed our review of the above referenced document dated February 2003, which we received on March 3, 2003. We have the following comments on this report:

#### **Table A-4, Construction Details of Proposed Extraction Wells and Observation Wells, Page A-10**

All proposed extraction and observation wells listed on this table have the same casing slot size identified. Observation (i.e. monitoring) wells and extraction wells have different functions. We would expect the casing slot size and engineered filter pack selected for extraction wells to be different than monitoring wells. Please reevaluate your basis for selection of casing slot size and filter pack for the proposed extraction wells.

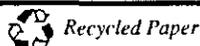
#### **Figure B-2, Proposed Groundwater Treatment System, Process Flow Diagram, Page B-7**

We recommend you consider onsite percolation of the treated groundwater discharge rather than discharging into a stormwater channel. There would be fewer discharge limitations and less stringent sampling requirements in waste discharge requirements for percolation.

#### **Appendix C, Standard Operating Procedures for Passive Diffusion Bag Sampler**

This appendix does not contain site specific sampling procedures for this sampling method. The sampling methodology used to collect individual samples needs to be explained.

*California Environmental Protection Agency*



**received**

April 17, 2003

How will evaluation of data collected from this sampling method be compared with results from methods used currently and over many years? Normally, when different sampling approaches are recommended during a long-term cleanup program, a site specific study is undertaken comparing both methods utilizing samples collected from defined wells to ensure confidence in sampling results. There is no discussion on the competence of this proposed groundwater sampling method and groundwater data collected to date.

For any questions on this review or related matters, please call me at (909) 782-4494.

Sincerely,

  
John Broderick  
SLIC/DoD Section

cc: US EPA, Region 9 - Nicole Moutoux  
DTSC, Office of Military Facilities - Triss Chesney  
NAVFACENGCOM, Southwest Division - Karnig Ohannessian