



California Regional Water Quality Control Board

Santa Ana Region



Taru Tamminen
Secretary for
Environmental
Protection

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Arnold Schwarzenegger
Governor

M60050_003824
MCAS EL TORO
SSIC NO. 5090.3.A

May 17, 2004

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

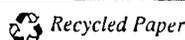
COMMENTS ON GROUNDWATER MONITORING DATA SUMMARY REPORT, SPECIFIED PETROLEUM STORAGE SITES, FORMER MARINE CORPS AIR STATION, EL TORO

Dear Mr. Piszkin:

We have reviewed the above referenced document, dated March 12, 2004, which we received on March 26, 2004. We have the following comments.

- **Section 2 Field Activities**, Pages 2-1 through 2-4: This Data Summary Report should include all petroleum corrective action sites for which groundwater monitoring is ongoing or required. Petroleum corrective action Site 16, Underground Storage Tank Release Site UST 590A and B, and any other petroleum corrective action site in which groundwater is impacted should be identified and discussed. Please revise this report to include all active groundwater impacted petroleum release sites.
- **Section 2.4 Investigation Derived Waste**, Page 2-2: Purge water was allowed to flow into a drainage area adjacent to Hanger 296 for disposal. From this description, we are unable to tell if the disposal was in a general area for infiltration or into a storm channel. According to Regional Board Order 2002-0044, discharge requirements for discharges that do not pose a significant threat to water quality are waived. Discharges such as monitoring well purge water are identified in the waiver. The discharge should be to the ground in a manner so that it will percolate back into the aquifer in the same general area. Adequate measures should be used to prevent purge water from flowing to surface waters. Please revise the report to make clear the issue on whether the discharge was percolated in the area adjacent to Hanger 296 or discharged into the storm drain nearest to Hanger 296.

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- **Section 3 Summary of Monitoring Results**, Page 3-1 through Figure 3-2: Site specific potentiometric survey results and groundwater monitoring data results should be presented on an appropriate map. It is very difficult to assimilate data from tables alone. Visual presentations are more useful. Revise this report to include site-specific maps presenting potentiometric survey data and sampled groundwater monitoring well locations with the water quality sampling results.

This is a second request. In our letter dated May 19, 2003, we requested the same information on figures in response to your Groundwater Monitoring Data Report for petroleum sites dated March 20, 2003.

For any questions, please call me at (909) 782-4494, or send e-mail to jbroderic@rb8.swrcb.ca.gov.

Sincerely,


John Broderick
SLIC/DoD Section

cc: Ms. Nicole Moutoux, US EPA, Region 9
Mr. Tayseer Mahmoud, DTSC, Office of Military Facilities
Ms. Lynn Hornecker, NAVFACENGCOM, Southwest Division