

Directors
PHILIP L. ANTHONY
TOM BANNISTER
IRYN L. BARR
JOHN V. FONLEY
DANIEL E. GRISET
LAWRENCE P. KRAEMER JR.
GEORGE OSBORNE
LANGDON W. OWEN
IRV PICKLER
ARNT G. "BUD" QUIST



Officers
DANIEL E. GRISET
President
ARNT G. "BUD" QUIST
First Vice President
IRV PICKLER
Second Vice President
WILLIAM R. MILLS JR.
General Manager
CLARK IDE
General Counsel
BARBARA WHITE
District Secretary

ORANGE COUNTY WATER DISTRICT

December 28, 1998

Mr. Tayseer Mahmoud
California Environmental Protection Agency
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630

SUBJECT: Comments on Draft Proposed Plan for Groundwater Remediation at OU-1 and OU-2A, MCAS El Toro

Dear Mr. Mahmoud:

Orange County Water District (OCWD) staff has reviewed the aforementioned document and provides the following comments:

1. Figure 1 (page 3) inaccurately indicates that the regional TCE plume, as defined by TCE at 0.5 ppb or greater, does not extend to Culver Drive. TCE concentrations at two non-potable-supply wells, IRWD-78 and TIC-113, along Culver Drive are greater than 0.5 ppb, as recently as September 1998. OCWD has provided water chemistry information for these two wells on several occasions to DON's current and former contractors, Bechtel and CH2MHill. The composite TCE concentrations delivered at the wellheads of the two production wells are likely *lower* than concentrations in specific aquifer zones, since these wells produce from several aquifer zones. We recommend that this figure be modified to accurately reflect known groundwater concentrations.
2. Page 7, remedial action objectives, third bullet – As currently written, the objective to "prevent domestic use of groundwater containing VOCs above cleanup goals" could be confusing to some people, since the preferred remedy entails using groundwater containing VOCs for municipal use *following treatment*. To avoid confusion, we recommend that the third bullet be qualified in some manner, such as inserting the words "without proper treatment" at the end of the bullet wording.
3. Page 14, Groundwater Remedial Alternatives – Comparative Cost Estimate Summary" table. The capital, O&M, and total costs of alternatives 7A and 11 are significantly different, but the descriptions and conceptual design diagrams of these two alternatives appear identical. Whatever facilities or other distinctions that cause the costs of these two alternatives to be

December 28, 1998
Mr. Tayseer Mahmoud
Page 2 of 2

different should be better described in the text and diagrams.

Thank you for providing us the opportunity to review this document. Please contact me at (714) 378-3260 or email at rherndon@ocwd.com if you have any questions.

Sincerely,



Roy L. Herndon
District Hydrogeologist

cc: Joseph Joyce, MCAS El Toro
Richard Bell, IRWD