

October 2005

Response to Formal Review Comments

Page 1 of 1

Document Title:

Field Change Justification No. 7 (draft), IRP Site 1 – Aquifer Tests 3 and 4, Former Marine Corps Air Station, El Toro, CA, prepared by Enviro Compliance Solutions, Inc., Tustin, CA, September 2005

Reviewer: Rich Muza, Remedial Project Manager, U.S. EPA Region 9, SFD-8-, 75 Hawthorne Street, San Francisco, CA 94105, Dated: October 13, 2005

Comment No.	Section/ Page No.	Comment	Response
1.	Task 6: Aquifer Test 4/Page 2	<p>How will the results from Aquifer Test 4 be evaluated? This testing as proposed is extremely unconventional and would not result in data that could be evaluated using aquifer test methods. I can understand the proposal from the standpoint of determining whether this ground-water system could be stressed over a prolonged period in order to determine whether pump and treat technologies might be applicable in this setting; however, from a strict scientific sense, these plans using multiple wells pumping over a period measured in weeks will not lead to data that are readily evaluated using existing techniques. I recommend that the plans for Aquifer Test 4 be expanded to discuss the data evaluation processes as the proposed plans are unconventional for aquifer testing.</p>	<p>Comment acknowledged. This comment applies to the final portion of the test after when three extraction wells will be brought online and operating simultaneously. The following verbiage has been inserted to the task to explain how drawdown data will be used and assessed during this phase of the test: "Groundwater levels will be measured periodically at extraction and observation wells for the remainder of the test, and groundwater level drawdown maps will be prepared. The groundwater level drawdown maps will be used to assess the operational ROI as a function of time when three extraction wells are operating simultaneously".</p>