ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

June 8, 2009

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To the BRAC Closure Team (BCT):

Subj: NOTIFICATION OF EXCEEDANCE OF EVALUATION CONCENTRATION LEVEL (ECL) FOR PERCHLORATE AND NITRATE AT ET-1, INSTALLATION RESTORATION PROGRAM SITES 18 AND 24, FORMER MARINE CORPS AIR STATION EL TORO, IRVINE, CALIFORNIA

In accordance with Section III.A.4.b.i. of the Settlement Agreement, OCWD is providing notification of ECL exceedances of perchlorate and nitrate at ET-1. On several occasions since 1998, the ECL for perchlorate was exceeded in the influent sample collected at the above referenced facility. The analytical results for perchlorate have ranged from non-detect to 4.6 micrograms per liter (ug/L), whereas the ECL for perchlorate is 1.8 ug/L (which is below the 2.5 ug/L reportable detection limit), as shown in Figure 1.

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On three occasions since 2005, the ECL for nitrate (as NO3) was exceeded in the influent sample collected at the above referenced facility. Since 1990 the analytical results for nitrate (as NO3) have ranged from approximately 21 to 79 milligrams per liter (mg/L), whereas the ECL for nitrate (as NO3) is 67 mg/L, as shown in Figure 2. Although the ECL for nitrate (as NO3) has been exceeded at ET-1, the groundwater from this facility is not being utilized for drinking water purposes. Federal and state regulations for non-potable use of this water are being met.

On most sampling events since 1990, the ECL for nitrate (as N) was exceeded in the influent sample collected at the above referenced facility. Since 1990 the analytical results for nitrate (as N) have ranged from approximately 5 to 18 mg/L, whereas the ECL for nitrate (as N) is 8 mg/L, as shown on Figure 3. Although the ECL for nitrate (as N) has been exceeded at ET-1, the groundwater from this facility is not being utilized for drinking water purposes. Federal and state regulations for non-potable use of this water area being met.

It is noted that the equivalent ECL of nitrate (as N) if expressed as NO3 would equal approximately 35 mg/L, which is well below the established nitrate (as NO3) ECL of 67 mg/L. While there is no explanation for this apparent discrepancy, the practical effect is that the nitrate (as N) ECL of 8 mg/L has been and will be exceeded more frequently than the nitrate (as NO3) ECL of 67 mg/L. It is also noted that the nitrate and perchlorate data presented in the attached figures was analyzed at OCWD's state-certified laboratory.

Therefore, OCWD recommends analyzing these parameters quarterly with trend analysis. If trends change over time (i.e., increase significantly), the DON and regulatory agencies will be notified to discuss any potential ramifications to the system. Should you have questions, please contact the undersigned at 714-378-3260 or Mr. John Hills at IRWD at 949-453-5850.

Sincerely,

Roy L. Herndon
Chief Hydrogeologist

Attachments: Figures 1 through 3

CC w/attachments:

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Figure 1
ET-1/1: Perchlorate*

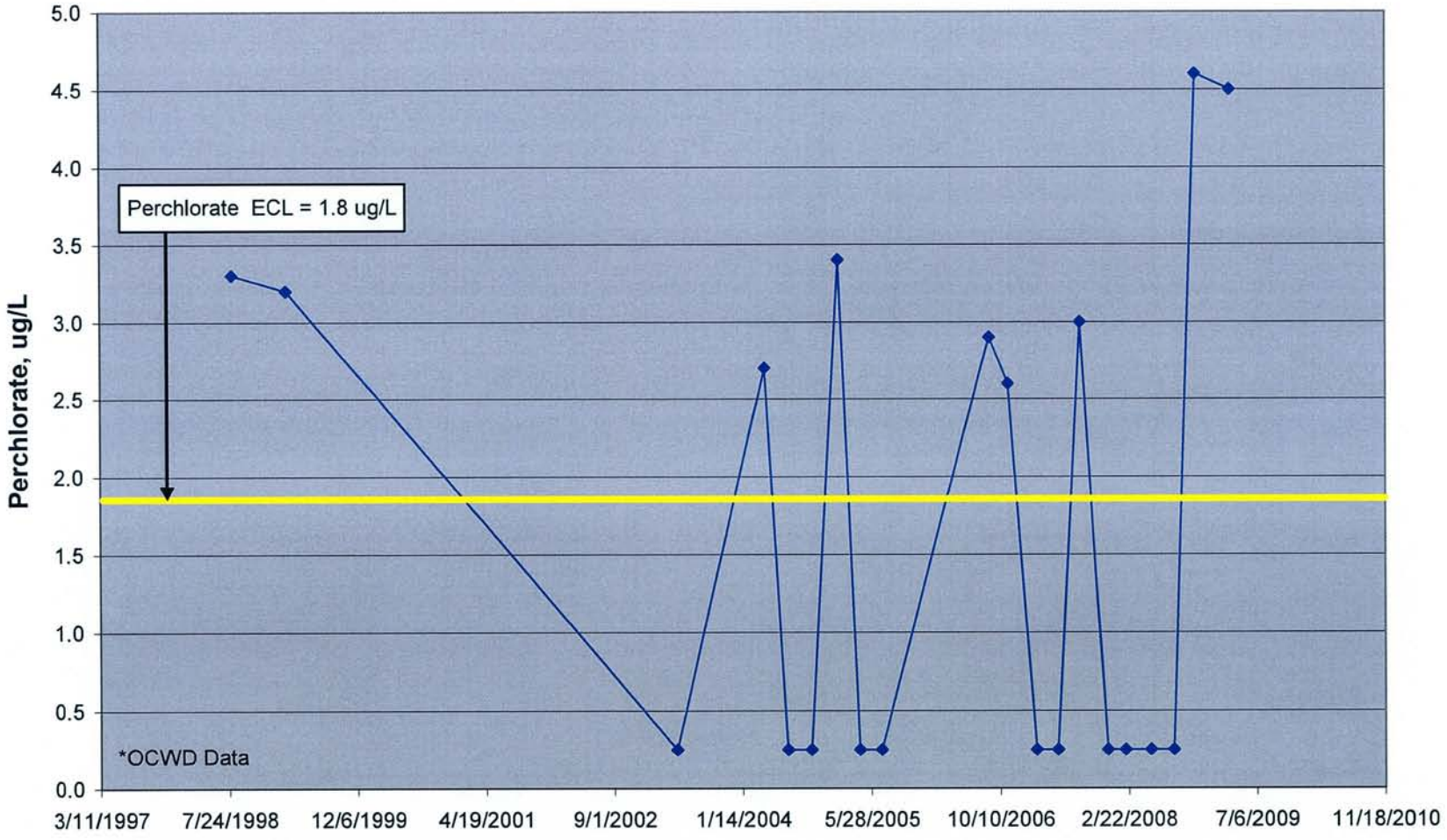

Figure 2
ET-1/1: Nitrate as Nitrate*

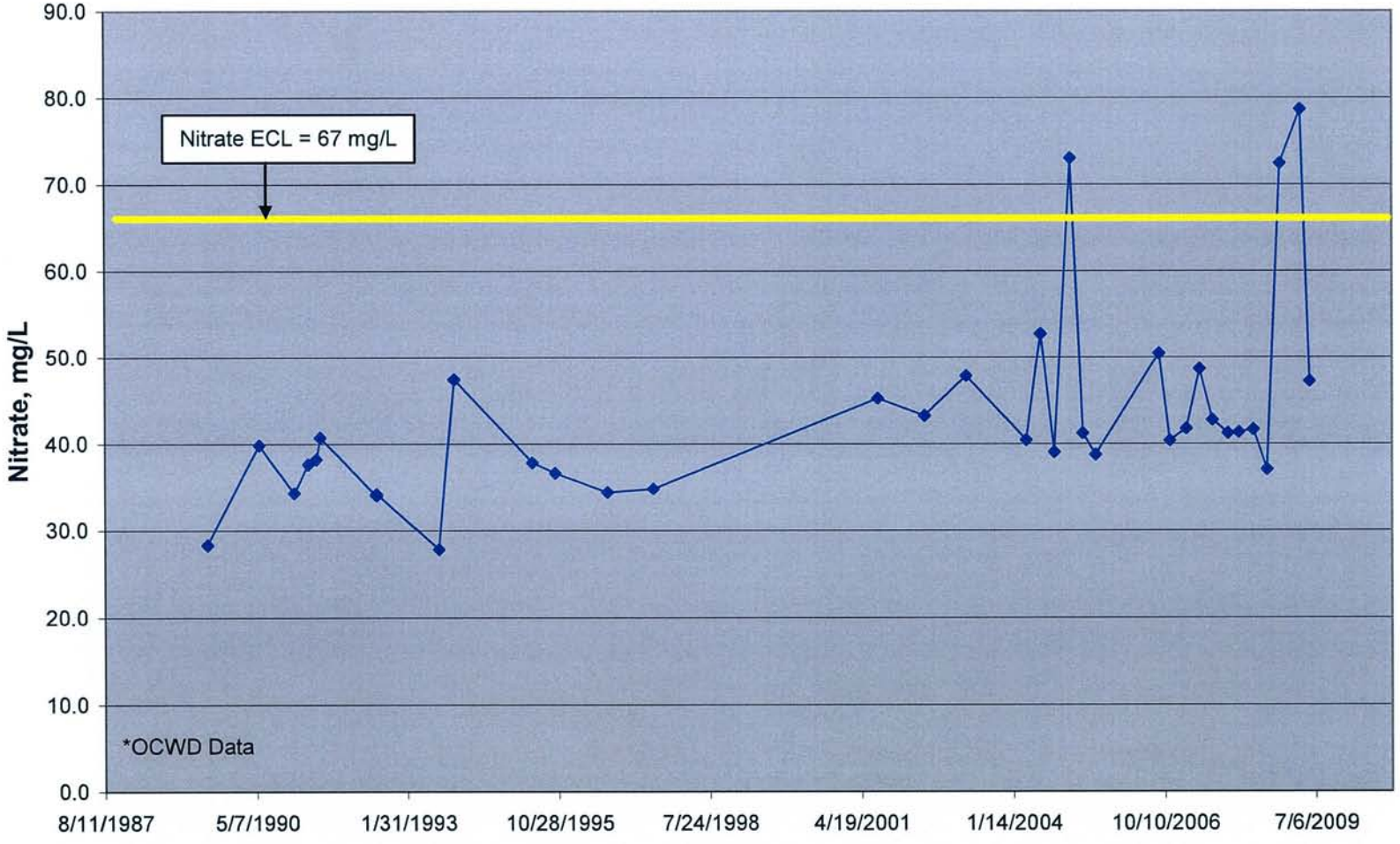

Figure 3
ET-1/1: Nitrate as Nitrogen*