California Regional Water Quality Control Board
Santa Ana Region

Linda S. Adams
Secretary for Environmental Protection

3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 • FAX (951) 781-6288 • TDD (951) 782-3221
www.waterboards.ca.gov/santaana

Arnold Schwarzenegger
Governor

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Base Realignment and Closure
Attn: Mr. Darren Newton
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, California 92618

COMMENTS ON FINAL GROUNDWATER MONITORING REPORT, SEPTEMBER 2005 MONITORING ROUND 22, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: T0605964530

Dear Mr. Newton:

We have reviewed the above referenced document, dated May 31, 2006, which we received on June 1, 2006. We have the following comments:

- **3.2.1 Site 1**, Page 3-4: The groundwater monitoring well representing the source area of the perchlorate plume was sampled, and the analytical results are reported. This site has a dissolved perchlorate plume that stretches from the Site 1 source area downgradient to Site 2. Sampling results for monitoring wells located on the downgradient edge of Site 1 and monitoring wells located further downgradient defining the dissolved plume were not included in this report. We recommend appropriate monitoring and reporting of the Site 1 plume.

- **4.1.2 Results of Sample Analyses - Site 2, Site 3, Site 5, & Site 17**, Pages 4-2 & 4-3: General mineral parameters have been appropriately monitored at these sites. This section states that general minerals are not contaminants of concern for all four landfill sites, and recommends termination of sampling for general mineral parameters. The sampling of general mineral parameters, including total dissolved solids, pH, electrical conductivity, chloride, nitrate as nitrogen, and sulfate, have been requested by Regional Board staff for all your landfill sites. California Code of Regulations, Title 27 (Title 27) has been identified as an applicable and relevant or appropriate requirement (ARAR) for Sites 2, 3, 5, 17 and Anomaly Area 3 at MCAS El Toro. According to 40 CFR 258.54(a)(2), the general mineral parameters are authorized as surrogate indicators for identification of a release of metals from solid waste management units. For this reason, their measurement is required at all active solid waste management units in the Santa Ana Region. Board staff considers the five landfill sites located on the former MCAS, El Toro to be in corrective action. When remedial actions have been completed at all of the Navy's landfill sites, and a detection monitoring program becomes appropriate, the general

mineral parameters and volatile organic compounds will be analyzed semiannually. Four discrete samples will be collected at each monitoring point during a sampling event. A statistical comparison will be required of the analytical results of upgradient (background) wells versus downgradient. We strongly recommend continuation of the appropriate monitoring of general mineral parameters at the landfill sites. General minerals are chemicals of concern at solid waste management units or landfills.

For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,

John Broderick
SLIC/DoD Section

cc via email: Richard Muza, U.S. EPA, Region 9
Soad Hakim, DTSC, Office of Military Facilities
Jim Callian, BRAC PMO WEST