California Regional Water Quality Control Board
Santa Ana Region

Alan C. Lloyd, Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

October 20, 2005

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

COMMENTS ON FIELD CHANGE JUSTIFICATION NO. 7, IRP SITE 1 – AQUIFER TESTS 3 AND 4, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: DOD100136000

Dear Mr. Newton:

We have reviewed the above referenced document, dated October 11, 2005, which we received via email on October 11, 2005. We have the following comments:

- **TABLE 1, PROPOSED WELL COMPLETION DATA (DRAFT)**: The extraction wells are proposed to be constructed utilizing four-inch casing, 0.02-inch slot screen size, and screen length of 30 to 40 feet. The proposed design is similar to that most commonly used for groundwater monitoring wells throughout our Region, not extraction wells. The extraction well design is likely to bias aquifer test results. The selected well diameter and screen slot size are too small to maximize flow efficiency and are not adequate to demonstrate whether pump and treat is a viable option. We recommend that, at a minimum, groundwater extraction wells be constructed in a 13-inch diameter boring with six-inch casing diameter, a filter pack with its grain size midway between a monitoring well filter pack and maximum extraction efficiency, and a screen with an appropriate slot size and that does not exceed 30 feet in length.

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: Mr. Richard Muza, US EPA, Region 9
Mr. Frank Cheng, DTSC, Office of Military Facilities
Ms. Lynn Hornecker, NAVFACENGCOM, Southwest Division