

FAX TRANSMITTAL

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GENERAL SERVICES ADMINISTRATION

AL PROTECTION AGENCY

IX

Street

San Francisco, CA 94105

Ctd-135/

File No. 0222

M60050.000007
MCAS EL TORO
SSIC #5090.3

July 7, 1999

Base Realignment and Closure
Attn: Mr. Joseph Joyce
P.O. Box 51718
Irvine, CA 92619-1718

Re: U. S. EPA Comments on Draft Final Record of Decision (ROD), Operable Unit 2B,
~~Landfill Sites 2 and 17~~, MCAS El Toro, CA

Dear Mr. Joyce:

The United States Environmental Protection Agency (EPA) has reviewed the document referenced above and finds that most of the document is satisfactory with only a few changes needed for EPA concurrence. Please note that comments from EPA attorney Thelma Estrada are also provided in this letter.

Comments:

- 1) Please delete Dan Opalski's name from the concurrence page and insert "Acting Chief" in place of his name.
- 2) The fifth bullet item ("Additional monitoring necessary"...) on page 2 of the "Declaration" is redundant and unnecessary and should therefore be deleted.
- 3) Please revise the bullet items on page 9-1 of the "Selected Remedy" to be more consistent with the bullet items in the "Declaration"; e.g., fencing, "signs", with locked gates"... , MOU between DON and USFWS, etc.

If you have any questions, please contact Thelma Estrada at (415) 744-1386.

Sincerely,



Glenn R. Kistner
Remedial Project Manager
Federal Facilities Cleanup Branch

cc: Patricia Hannon, RWQCB
Gregory Hurley, RAB Co-Chair
Tayseer Mahmoud, DTSC
Polin Modanlou, LRA
Andy Piszkin, SWDIV ✓

July 9, 1999

MEMORANDUM

To: Glenn Kistner
RPM, El Toro

Fr: Thelma K. Estrada *TK*
ORC

Re: Draft Final ROD, OU2B, Landfill Sites 2 and 17

I reviewed the above-referenced document and have the following comments:

1. P.2: Delete the sixth bullet since this information is not relevant to this ROD.
2. P.10-2-6: Chemical-Specific ARARs - since we took out the groundwater remedy for Site 2 in this ROD, there really are no chemical-specific ARARs. The soil and air chemical-specific ARARs are more appropriately classified as action-specific ARARs.
3. P.10-8: Second paragraph - the explanation here as to why the landfill closure and postclosure requirements are relevant and appropriate instead of applicable is good. A similar explanation should go in the ARARs Table, in a footnote.

ARARs Tables:

General Comment: the pages for these tables should be numbered.

Table 10-1:

*Third row ("TCLP regulatory levels....") - this should be stated in a requirement form, e.g., "soils to be used as cover for LF sites will have to meet requirements based on TCLP...." Again, per my comment above, these "chemical-specific ARARs" are more appropriate under "action-specific ARARs."

*The requirements pertaining to beneficial uses, water quality objectives, listed under "State and Regional Water Quality Control Board" should be deleted. These requirements are only relevant in a groundwater remedial action. The requirement that the leachate from the LFs shall not cause exceedance of the water quality objectives for the groundwater underneath the LFs can be addressed as part of the LF closure/postclosure requirements, specifically as part of the groundwater monitoring requirements.

*Footnotes for Table 10-1 - I do not understand what information we want to convey in the footnote that reads "Chemical-specific concentrations used for FS evaluation...."

Table 10-2:

* The requirements listed under National Archaeological and Historical Preservation Act, Endangered Species Act, Migratory Bird Treaty Act, need to be stated in complete sentences that clearly state what the requirements are. For instance, the statement "General protection and conservation of fish and wildlife resources" is not a sentence.

Table 10-3:

- * The requirement pertaining to beneficial uses (sentence beginning with "Authorizes the SWRCB and RWQCB boards to establish....") should be deleted for the same reason stated above, i.e., there is no groundwater remedial action in this ROD.
- * The requirement that reads "A discharger shall establish a corrective action...." should be changed to the following: "A discharger shall remediate releases from the waste management unit that affect water quality." Refer to my comment on the previous draft regarding references to corrective action.
- * The statement "excavation of landfill sites" needs to be restated as a requirement.
- * The requirement under 27 CCR 21160(b) ("Requires gas monitoring and control be conducted during the closure and postclosure maintenance period.") is listed as applicable. Why is this not relevant and appropriate, like the other requirements for 27 CCR 21100 listed above it?

Table 10-4:

- * While it is explained in the text, there should still be a footnote in this table explaining the basis for the "controlling" determination.
- * There is a typographical error in the requirement listed as "Postclosure Care Period." The correct regulatory citation is 66264.117, instead of 6264.117.

If you have any questions regarding the above, please give me a call.