



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION IX  
 75 Hawthorne Street  
 San Francisco, CA 94105

M60050.000053  
 MCAS EL TORO  
 SSIC #5090.3

June 14, 1999.

Mr. Joseph Joyce  
 BRAC Environmental Coordinator  
 AC/S Environmental (1AU)  
 MCAS El Toro  
 P.O. Box 95001  
 Santa Ana, CA 92709-5001

OPTIONAL FORM 88 (7-97)

FAX TRANSMITTAL

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To	JOSEPH JOYCE	From	GLENN KISTNER
Dept./Agency	SW DIV	Phone #	(415) 744-2210
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NSN 7540-01-217-7306		6000-101 GENERAL SERVICES ADMINISTRATION	

Re: ~~U.S. EPA Comments on Draft Record of Decision (ROD), Operable Unit 2C, Landfill sites 3 and 5, Marine Corps Air Station El Toro, California~~

Dear Mr. Joyce:

The United States Environmental Protection Agency (EPA) has reviewed the above referenced document. EPA's comments are provided below, including comments from EPA attorney Thelma Estrada.

Please contact me if you would like to discuss our comments.

### General Comments

- 1) The text states that Site 3 is comprised of four Units, and that Units 2 and 3 were not part of the operational landfill. It is not clear what will happen to Units 2 and 4. The text, including the Declaration, should more clearly state what will happen to each of the four Units at Site 3.
- 2) Please expand the rationale for each of the Units that will not have remediation.

### Specific Comments

- 1) Pg. 5-2, last paragraph - A reference should be made as the page(s) where the risk associated with Unit 3 is discussed.
- 2) Pg. 5-5, Unit 2 - Please mention in the text how 300ug/l was determined to be the "hotspot" criteria for VOCs.
- 3) Pgs. 5- and 5-7, Section 5.2.2.3 and 5.2.2.5 - The text should be modified for Unit 2 sediment/soil samples to be consistent with text descriptions of the other Units.
- 4) Pg. 7-1, 2nd paragraph, - Although the Phase II RI concluded that landfill gas emissions at Site 3 and 5 are too low to warrant landfill gas controls, the California Integrated Waste

Management Board (TWMB) has stated on a number of occasions that additional monitoring is necessary before they will support such a conclusion. Their concerns need to be addressed before such conclusions can be accepted by the regulatory agencies.

5) Pg. 9-1, Selected Remedy - Consider inserting the word "approximately" before "2-foot-thick foundation layer", to allow some flexibility in the cap design.

6) Pg. 9-1, Selected Remedy - The specific action for each unit of Site 3 needs to be stated in this section.

7) Pg. 9-1, Selected Remedy - The paragraph describing metals needs to be revised to better explain where metals concentrations are occurring, e.g., in soil, in groundwater? Also, include a statement about VOCs... are they a problem and will they be monitored.

8) Pg. 9-2, first paragraph - the last sentence should be modified, e.g.; ...O&M activities such as monitoring, may be modified based on results of the 5- year review and/or the long-term monitoring program.

The following comments are provided by Thelman Estrada:

#### General Comment:

Overall, the quality of the document is excellent - clearly written, well organized, and it does a thorough job of documenting and supporting the decision for the selected remedy. The biggest problem I saw was in the ARARs Table. I liked the fact that the ARARs Table was not a laundry list of requirements. It was evident that a lot of thought went into the ARARs section. However, I was confused by the seemingly inconsistent designation of State ARARs from the same body of regulations: e.g., one requirement from Title 27 was designated applicable in one part of the Table while another requirement from Title 27 was designated relevant and appropriate in another part of the Table. It seems to me that all the closure and post-closure requirements from Title 27 (and parts of Title 23) are applicable to these landfills. The rest of the Title 27 requirements are relevant and appropriate.

#### Specific Comments:

##### Text:

1. p. 1-6: Last par, first sentence: Explain the phrase "appears to be affected by the presence of landfill materials, depending on location."

2. pp. 5-3 to 5-11: Site Characterization by Medium: It would be helpful to the reader if at the end of each section, a sentence or two states the conclusion drawn from the sampling results. Some sections have this ("None of the reported concentrations exceed the LEL for methane."); others don't ("Table 5-9 presents the analytes detected, their respective frequency of detection and their range of reported concentrations.").

3. p. 7-2: First full par: In the earlier part of the document, it states that initially, the future use

for Site 3 was industrial/light commercial although now it seems that most current Community Reuse Plan designates the future use for the site as a golf course. All throughout the document, Site 3 is still designated as industrial/light commercial use. Which one is it?

4. p. 7-3: Under Institutional Controls: This states that the DON shall notify the CIWMB in the event of transfer of Sites 3 and 5 and that transferees shall also notify the CIWMB in the event of a land-use change for these sites. I think all the regulatory agencies have to be notified, not just CIWMB, in the event of a change in land-use.

5. p. 9-6: Land-Use Control Restrictions: Fourth bullet - how does DON propose to prohibit land-disturbing activity on lands adjacent to the landfill? I assume it will be done by imposing use restrictions on these lands at the time of transfer which will run with the land. This should be stated explicitly.

6. p. 10-2: Soil Chemical-Specific ARARs: A hazardous waste determination is done for the contaminated soil not just because of LDR considerations but also for accumulation and disposal requirements.

7. p. 10-3: Action-Specific ARARs: See my comment above ("General Comment") regarding designation of State requirements as applicable or relevant and appropriate.

8. p. 10-4: First full par: Why does irrigation make the requirements applicable instead of relevant and appropriate? This paragraph concludes correctly that Closure and Postclosure Maintenance Standards for Disposal Sites and Landfills are applicable. In other words, it is not the irrigation that makes these requirements applicable.

9. p.10-5: Last par, first sentence: EPA should be included in the list of parties making the determination.

#### ARARs Table:

10. p. 10-7: Why are there groundwater ARARs and references to waste discharge requirements when the remedial action does not involve groundwater?

11. p. 10-8: Second row - see comment above re applicability of closure requirements. [This inconsistent designation of requirements as applicable or relevant and appropriate is a problem throughout the entire ARARs Table. It may help if the comment section explained why one requirement is applicable while another is relevant and appropriate.

12. p. 10-9: I don't understand the footnote here regarding chemical-specific concentrations used for FS evaluation not being ARARs.

13. p.10-15: Second row - the requirement here is the same, i.e., alternatives to construction or prescriptive standards, from Title 27. However, one line states this is relevant and appropriate; the next line states this is applicable.

14. pp. 10-21 to 10-27: I like the comparison of the potential closure and postclosure requirements from the different regulations. It is not clear, however, how DON concludes which is the controlling ARAR. A footnote or a sentence in the Comment Section should do this.

Please feel free to contact me if you have any questions.

Sincerely,



Glenn R. Kistner  
Remedial Project Manager  
Federal Facilities Cleanup Branch

cc: Patricia Hannon, RWQCB  
Gregory Hurley, RAB Co-Chair  
Peter Janicki, CAIWMB  
Tayseer Mahmoud, DTSC  
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