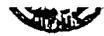




California Integrated Waste Management Board

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MCAS EL TORO
SSIC # 5090.3



Daniel G. Pennington, Chairman

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Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

November 29, 1999

Ms. Sharon Fair
Department of Toxic Substances Control
Office of Military Facilities
5796 Corporate Avenue
Cypress, CA 90630

Comments on Final Record of Decision (Working Draft) for Sites 2 and 17, El Toro Marine Corps Air Station (MCAS)

Dear Ms. Fair:

On November 2, 1999, the California Integrated Waste Management Board (Board) Closure and Remediation Section staff received a copy of the aforementioned document, dated October 1999.

Board staff have reviewed the draft ROD for compliance with the Applicable, Relevant and Appropriate Regulations (ARARs) issued by this agency under Title 27, California Code of Regulations and addressing closure and postclosure maintenance of the Sites 2 and 17. The Orange County Solid Waste Local Enforcement Agency has also reviewed the draft ROD and concurs with the below comments.

Based on the information contained in this document, Board staff find the draft ROD inadequate for the following reasons:

General Comments

1. The Record of Decision (ROD) lacks sufficient information to evaluate the proposed landfill closure design and postclosure land use and the adequacy of the proposed institutional controls. Furthermore, the ROD conditions the employment of land use restrictions upon agreements with the future land owners but remains very vague on identifying these entities. As stated by Board staff previously, the preferred approach would be to define these land use restrictions as an integrated part of the chosen closure alternative.
2. The ROD does not describe or depict the regulatory compliance boundaries for either of the two landfills. Because of the unknown landfill boundaries, Board staff cannot evaluate the adequacy of the proposed landfill gas migration monitoring network.
3. It is Board staff understanding that it is very likely that a public road may be constructed in the immediate vicinity of Site 2. However, the ROD lacks any information validating this proposal. Board staff request that the ROD includes a proposal specifically addressing the possible impacts from the road being constructed immediately to Site 2

California Environmental Protection Agency

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Specific Comments

1. Landfill gas monitoring probe locations and their vertical configuration should be depicted on a drawing which should also include both the landfill compliance boundaries and waste fill extent.
2. Board staff should be provided with the probe design details and proposed construction methods. Board staff request that multi-depth probe design be employed for the proposed monitoring network. Alternatively, a valid justification should be provided if such design is not necessary.
3. A drawing depicting the proposed landfill gas monitoring network for both scenarios (with and without the road) should be included in the ROD.
4. Steps should be taken to assure that all information obtained during probe installation will be accurately recorded and subsequently submitted for Board staff review upon project completion.
5. The ROD should demonstrate that the construction of the Road would not have negative impacts on the landfill closure or postclosure maintenance or interfere with the proposed land use. The explanation should be supported either by including the supporting documentation (such as drainage, erosion and settlement calculations) or by making a reference to the existing documents relevant to this subject.
6. Landfill gas monitoring probe locations and their vertical configuration should be compared with the available geological and hydrogeological information to confirm their functionality and longevity.
7. A Schedule should be provided for the landfill gas migration monitoring system installation.

Should you have any questions regarding this matter, you can contact me at (916) 255-1302.

Sincerely,



Michael B. Wochnick, Manager
Closure and Remediation Section
Permitting and Enforcement Division

cc: Ms. Patricia Hannon, Santa Ana Regional Water Quality Control Board
Ms. Laura Duschnak, BRAC Operations Office
Mr. Steve Sharp, Orange County Solid Waste Local Enforcement Agency