



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Santa Ana Region

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MCAS EL TORO
SSIC NO. 5090.3



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February 18, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
Naval Facilities Engineering Command, Southwest Division
1220 Pacific Highway
San Diego, CA 92132-5190

REGIONAL WATER QUALITY CONTROL BOARD (RWQCB) APPLICABLE RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs) FOR SITE 16, MARINE CORPS AIR STATION EL TORO

Dear Mr. Gould

On January 14, 2000, we received your request for ARARs for a potential Remedial Action at IR site 16, Crash Crew Pit #2 in compliance with Section 121(d) (2) (A) of CERCLA and the National Contingency Plan 40 CFR SS300.400 (g) and 300.515(d) & (h). The following is a list of our ARARs:

- **Water Quality Control Plan Santa Ana River Basin 1995 (Basin Plan)**

Citation: Chapter 3, Beneficial Uses

Description: Defines beneficial uses for groundwater beneath El Toro MCAS as: municipal, agricultural, industrial service and industrial process supply.

Comments: The identification of the groundwater as a potential drinking water source (municipal) forms a basis for selection of concentration limits, cleanup levels and treatment levels.

ARAR Status: Applicable, Action

Citation: Chapter 4, Water Quality Objectives

Description: Defines the groundwater quality objectives for non-degradation, taste and odor, bacteria, chemical constituents, toxic substances, radioactivity, and minerals.

Comments: Concentration limits, cleanup levels, and treatment levels established for Site 16 must conform to the Basin Plan objectives.

California Environmental Protection Agency

ARAR Status: Applicable, Action, Chemical

Citation: Chapter 5, Implementation, Salt Balance and Assimilative Capacity – Lower Santa Ana Basin.

Description: Describes the actions that are necessary to achieve the water quality objectives and protect beneficial uses of the regions surface and groundwater.

Comments: Applies to control, removal or remedial actions associated with groundwater remediation at Site 16.

ARAR Status: Applicable, Action, Chemical

- **Statement of Policy with Respect to Maintaining High Quality of Waters in California**

Citation: State Water Resources Control Board Resolution No. 68-16

Description: Establishes policy on maintaining the high quality of California's surface and groundwaters.

Comments: Affects discharges from treatment systems and migration of contaminated or polluted water into high quality waters.

ARAR Status: Applicable, Action, Chemical, Location

- **Sources of Drinking Water Policy**

Citation: State Water Resources Control Board Resolution No. 88-63 and Regional Board Resolution No. 89-42.

Description: Defines all groundwater and surface waters as existing or potential sources of drinking water with a few specified exceptions (these exceptions are specified in Chapter 3, Beneficial Uses of the Basin Plan).

Comments: The identification of the groundwater beneath Site 16 as potential drinking water sources provides information to determine concentration limits, cleanup levels or treatment levels.

ARAR Status: Applicable, Location

- **Policies and Procedures for investigation and Cleanup and Abatement of Discharges Under the Water Code Section 13304**

Citation: State Water Resources Control Board Resolution No. 92-49 (As Amended on April 21, 1994 and October 2, 1996)

Description: Requires the investigation, cleanup and abatement to extend to any location affected by a discharge or threatened discharge and sets policies and procedures for all investigations and cleanup and abatement activities.

Comments: This is applicable to investigations and remedial activities at Site 16.

ARAR Status: Applicable, Action, Chemical, and Location.

- **Porter-Cologne Water Quality Control Act 1998**

Citation: California Water Code § 13000

Description: Defines the legislative intent to attain the highest water quality reasonable, considering all demands being made.

Comments: Basis for selection of background levels as the goal for cleanup criteria

ARAR Status: Applicable, Action

Citation: California Water Code § 13176

Description: Requires the analysis of material be preformed in a state certified laboratory.

Comments: For all investigations and remedial actions.

ARAR Status: Applicable, Action

Citation: California Water Code Chapter 4, Article 4

Description: Requires submission of information regarding waste discharges and states that requirements shall be prescribed to implement water quality control plans. Technical or monitoring reports may be required for investigation of water quality. Provides for penalties for non-compliance.

Comments: Removal and remedial actions must comply with substantive requirements.

ARAR Status: Applicable, Action, Chemical, Location.

Citation: California Water Code Chapter 5, Article 1

Description: Requires cleanup and abatement of conditions of pollution or nuisance or threatened pollution or nuisance.

Comments: Applies to all investigation and remedial actions.

ARAR Status: Applicable, Action

Citation: California Water Code, Chapter 10, Article 3

Description: Specifies requirements for water wells, monitoring wells, and cathodic protection wells.

Comments: Applies to all well installations.

ARAR Status: Applicable, Action

• **Discharges of Waste to Land**

Citation: California Code of Regulations, Title 27, Division 2, Chapter 3

Description: Specifies water quality monitoring and response programs for waste management units. Requires establishment of concentration limits for groundwater, surface water, and the unsaturated zone. Monitoring points and Points of Compliance shall be specified in the requirements.

Comments: Applies to Site 16 due to waste discharged during past operations.

ARAR Status: Relevant and Appropriate, Action, Chemical, Location

Dean Gould
El Toro MCAS, Site 16 ARARs

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If you should have any questions, please call me at (909) 782-4498 or e-mail at phannon@rb8.swrcb.ca.gov.

Sincerely,



Patricia A. Hannon
DoD Section

cc: State Water Resources Control Board, Office of Chief Counsel – Ted Cobb
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