



California Integrated Waste Management Board



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Winston H. Hickox
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Environmental
Protection*

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M60050.001013
MCAS EL TORO
SSIC #5090.3

September 7, 2000

Mr. Dean Gould
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

**COMMENTS ON DRAFT WORK PLAN, REVISION 1, AUGUST 4, 2000, FOR THE
PREDESIGN ACTIVITIES AT INSTALLATION RESTORATION SITES 3 AND 5, AND
DEBRIS DISPOSAL FROM SITE 1, MARINE CORP AIR STATION EL TORO,
CALIFORNIA**

Dear Mr. Gould:

Integrated Waste Management Board (IWMB) and Local Enforcement Agency (LEA) staff have received and reviewed the subject work plan and appreciate the opportunity to work with the Department of the Navy (Navy) to ensure that Marine Corp Air Station (MCAS) El Toro inactive landfills are closed in an environmentally sound manner. The Work Plan calls for exploratory trenching at sites 3 and 5 in order to determine the landfill boundaries. In addition to this goal, CIWMB and LEA believe that waste characterization and potential for landfill decomposition gas production should be objectives as well. Therefore, CIWMB and LEA staff have the following comments:

- During trenching all excavated waste should be characterized to determine the potential for biodegradation that could result in the production of landfill decomposition gas. Please provide a methodology for detailed logging of exposed waste during implementation of the work plan.
- Monitoring for methane gas should occur during the trenching operations. Please provide a methane gas protocol to be followed during implementation of the work plan.
- When waste is encountered during the trenching operation, how will it be handled? Will it be characterized, classified, and sent to an appropriate landfill?
- The rationale for selecting the number, size and location of the trenches is not clear. Please submit an additional explanation for this rationale.

- On page 3-7, first paragraph, it states that excavation will cease when no waste is found in the initial trenching location. When waste is not present in the initial trench, additional trenching locations may be necessary in order to delineate the landfill boundary. Please adapt the work plan to allow for engineering judgement in the field.
- On page 4-5, section 4.9, first paragraph, it states that all trenching will conform to South Coast Air Quality Management District (SCAQMD) Rule 1150. CIWMB and LEA Staff recommend that the Navy contact SCAQMD in order to determine if an excavation permit is required for this trenching operation.
- The routing slip does not indicate whether this work plan was sent to the California Department of Health Services (DHS). Please insure that this work plan is reviewed and approved by the DHS Radiological Health Branch for the radiological waste issues identified in the work plan.

Again, thank you for the opportunity to provide input to the landfill investigation. If you have any questions, please contact Ms. Melissa Gunter of my staff at (916) 255-3831 or Mr. Steven Sharp of the Orange County Environmental Health Department (LEA) at (714) 667-3623.

Sincerely,



Michael B. Wochnick, P.E., Manager
Closure and Technical Services Section

CC Mr. Steven Sharp – LEA
Ms. Triss Chesney - Department of Toxic Substances Control
Ms. Patricia Hannon – Santa Ana Regional Water Quality Control Board
Mr. Glen Kistner – US EPA
Ms. Polin Modanlou – Orange County Master Development Program