

Memorandum

To: Juan M. Jimenez
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Department of Toxic Substances Control
245 West Broadway, Suite 425
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Date: March 22, 1995

From: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION
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Telephone: CALNET 632-4130 Public (909) 782-4130

SUBJECT: ADDITIONAL ARARS FOR SPECIFIC REMEDIAL ALTERNATIVES FOR
OPERABLE UNIT 1 (OU-1) AT MARINE CORPS AIR STATION, EL
TORO

On March 9, 1995 we received your request for RWQCB ARARS for MCAS El Toro OU-1, specifically to address additional remedial alternatives. We understand that the Department of Navy (Navy) is not requesting ARARS for the remedial alternatives already addressed in the September 1994 draft Investigation and Feasibility Study. We also reviewed the draft ARARS analyses (Enclosures 2 and 3) which were included with the Navy's February 17, 1995 letter to you. We appreciate the fact that the Navy did a thorough analysis of our ARARS. Since Enclosures 2 and 3 have identified most of our ARARS, the following comments will focus on these two documents only to the extent where clarification or correction is required.

1. Enclosure #2

Section 2.1.2 (and other sections with reference to the Basin Plan)

All references to the "1994" Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) should be changed to "1995". The 1995 Basin Plan has been approved by the State Office of Administrative Law. Please change the last two sentences on Page 4, first paragraph, to reflect this approval.

Section 2.1.2, last sentence of the section, Page 6

Reinjection of the groundwater will contribute total dissolved solids (TDS) and nitrates to the basin. However, as the concentration of TDS and nitrates in the reinjection water is expected to be the same as the groundwater, the concentrations of TDS and nitrates in the groundwater will not significantly change. Also, the TDS and nitrate levels in the local groundwater and treated reinjection water may not be consistent with the water quality objectives specified in the Basin Plan. However, we do recognize the fact that the high TDS and nitrate levels at the site may not be due to past operations at the MCAS El Toro site, and therefore, requiring cleanup of these constituents beyond background levels may not be appropriate.

Section 2.1.3, last paragraph on Page 6

We think that for both Alternatives 2a. and 5a., the antidegradation policy is applicable especially if the treated water is reinjected outside the contaminant plume. If the treated water is reinjected within the contaminant plume in compliance with our established treatment standards, it would not result in degradation of water quality and an antidegradation analysis is not necessary for those constituents that are above the water quality objectives. For all other constituents, an antidegradation analysis is required.

Section 2.2.1, Page 7

Remedial action objectives for the groundwater must be reconsidered in light of SWRCB Resolution No. 92-49. The remedial action objectives must be the lowest levels that are technically and economically achievable, and at a minimum, must attain the MCLs.

Section 2.2.3, next-to-last paragraph on Page 8

Since the exact location of reinjection has not been determined, it may be premature to state that Alternatives 2a. and 5a will improve the overall water quality in the area. If the proposed reinjection is outside the contaminant plume, the discharge may not improve the existing quality of the receiving waters. Furthermore, treatment to MCLs for reinjection outside the contaminant plume would not comply with SWRCB Resolution No. 68-16's requirement that the discharge meet best practicable treatment or control.

Section 2.2.4, Page 9

Substantive provisions of a permit are applicable or relevant and appropriate requirements, not TBCs.

Enclosure #3

Section 2.1, last sentence of the section, Page 2 (and Section 2.4, Page 3)

Please note that the use of reclaimed water by The Irvine Company and the Irvine Ranch Water District are regulated by the Regional Board through water reclamation requirements. These reclamation requirements are consistent with the water quality objectives specified in the Basin Plan. Therefore, for any discharge of treated water to the reclamation system operated by these dischargers, we will not be specifying any additional requirements.

Section 2.3, Page 2

Dry washes are tributary to surface waters. Any discharge to surface water bodies, including tributaries, needs to be regulated under a NPDES permit. However, we recognize that under controlled conditions, it is possible to recharge treated water through dry washes without any discharge to surface water bodies. The ARARs identified in this section are only applicable if appropriate controls are in place to avoid any discharge to surface water bodies. Any action to dam the dry washes would require a Clean Water Act (CWA) Section 404 permit (off-site), and must meet conditions for CWA Section 401 Water Quality Certification.

Enclosure #2, Section 2.1.2, and Enclosure #3 Section 2.3

Please make it clear that for both recharge and reinjection, TDS and nitrate levels for the discharged groundwater will not be above the levels in the receiving water if the receiving waters are above the water quality objectives for TDS and nitrates, and will comply with Resolution No. 68-16 if the receiving waters are below water quality objectives.

If you have any questions, please contact me at 909-782-4998.

Lawrence Vitale
for

Lawrence Vitale
DoD Remedial Program Manager

cc: Ted Cobb, Office of the Chief Counsel, SWRCB, Sacramento
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