

## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

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SSIC # 5090.3



June 10, 1993

Mr. F. Andrew Piszkin, P.E.  
Southwest Division, NAVFACENGCOM  
Environmental Division  
1220 Pacific Highway, Room 18  
San Diego, California 92132-5181

Subject: Soil Cleanup Levels  
Marine Corps Air Station, El Toro

Dear Mr. Piszkin:

As a result of unresolved discussions which have occurred during several recent Project Manager's Meetings, this synopsis is to aid in explanation of our approach on setting soil cleanup levels where soil contamination is actually or potentially discharging to the waters of the State. Your request is for cleanup levels which will be set in the Record of Decision (ROD). If contaminated soils are found to threaten beneficial uses of ground or surface waters, our cleanup goal for waters of the State is always zero. However, to satisfy the ROD requirement to establish cleanup levels and to comply with our antidegradation policy (fundamental for our program), we consider concentrations resulting from application of best practicable treatment or control as the appropriate cleanup levels. For us, the point of discharge is at the receiving water resource and our goal is for zero discharge at that point. Consequently, soil cleanup levels must be established based on this goal. We apply best practicable treatment or control (BPT) to meet this goal. However, if the goal can not be achieved with BPT, discharges containing pollutants may be allowed provided those discharges A) do not cause a pollution or nuisance; and B) maintains the highest water quality possible.

In the case of groundwater which is already affected by soil contamination, the standards necessary to protect and restore beneficial uses of the water will be the aquifer cleanup concentrations (these standards could be MCLs, secondary MCLs, taste and odor thresholds, and other appropriate water quality criteria). In this case the soil cleanup levels should be based on aquifer cleanup standards (i.e. soil leachate will not cause an increased concentration above the standards).

In the case of groundwater which is not yet affected by soil

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contamination, application of best practicable treatment or control is required.

In the case where it can be shown that groundwater will not be affected, no cleanup for water quality protection is required.

Our primary goal is sufficient cleanup of soil to prevent contaminant migration into the water resource and affects on beneficial uses. However, we must find that the cleanup costs relative to the resource protection provided are consistent with maximum benefit to the people of the State.

For any questions on this synopsis or any other matter, please contact me at (909) 782-4494.

Sincerely,



John Broderick  
Special Projects Section

cc: LCDR. L. Serafini, Marine Corps Air Station, El Toro  
Mr. John Hamill, United States Environmental Protection  
Agency  
Mr. Joe Zarnoch, California Department of Toxic Substances  
Control