



Cal/EPA

Department of  
Toxic Substances  
Control

245 West Broadway,  
Suite 425  
Long Beach, CA  
90802-4444

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December 6, 1996 10 Dec 96 14 56

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MCAS EL TORO  
SSIC # 5090.3



Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

Mr. Joseph Joyce  
BRAC Environmental Coordinator  
U.S. Marine Corps Air Station - El Toro  
P. O. Box 95001  
Santa Ana, California 92709-5001

**LANDFILL CLOSURE ISSUES AT MARINE CORPS AIR STATION (MCAS) EL TORO**

Dear Mr. Joyce:

The purpose of this letter is to clarify landfill closure issues associated with the possible Site 2 consolidation/relocation to Site 17. The Navy requested the clarifications during our November 20, 1996 BRAC Cleanup Team (BCT) meeting. The California Integrated Waste Management Board letter of December 2, 1996, indicated that consolidation, if chosen as part of final landfill closure that may result in either vertical and/or lateral expansion of the remaining landfill units, such expansion must comply with the applicable U.S. EPA Subtitle D regulations regarding bottom liner installation. However, the Regional Water Quality Control Board (RWQCB) has the authority to exempt the proposed landfill expansion from a bottom landfill liner installation requirement, if the Navy can demonstrate that the absence of a liner poses no increased environmental threat to the groundwater quality in the landfill area.

Enclosed is the December 3, 1996 memorandum from the RWQCB which outlines the information needed to exempt the landfill expansion from bottom liner installation. If you have any questions, please call me at (310) 590-4891.

Sincerely,

Tayseer Mahmoud  
Remedial Project Manager  
Base Closure Unit  
Office of Military Facilities  
Southern California Operations

Enclosure

cc: See Next Page



cc: Mr. Glenn Kistner, SFD-8-2  
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# Memorandum

**To:** Mr. Tayseer Mahmoud  
Department of Toxic Substances Control  
245 West Broadway, Suite 350  
Long Beach, CA 90802-4444

**Date:** December 3, 1996

**From:** CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION  
3737 MAIN STREET, SUITE 500, RIVERSIDE, CALIFORNIA 92501-3339  
Telephone: CALNET 632-4130 Public (909) 782-4130

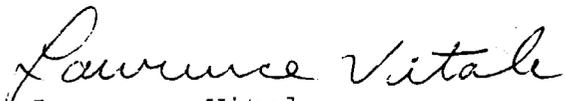
**Subject:** LANDFILL CLOSURE ISSUES AT MARINE CORPS AIR STATION (MCAS)  
EL TORO

This is in response to your memorandum dated November 22, 1996 regarding the proposed engineered cover design (monolithic cover) for landfill closures at the MCAS El Toro. The proposed reuse plan, that may include a golf course at the Site 5 landfill location. Additionally, you requested clarification regarding any liner requirements for consolidation of wastes at Site 17.

In our November 15, 1996 memorandum on El Toro MCAS landfill Site 5 feasibility study, we stated that alternatives 4a, 4b, 4c, and 4d are acceptable to us. In addition, we suggested that alternative 3, Monolithic Cover, would also be acceptable if equivalency could be shown with the prescriptive cover design. We suggested that by selecting the appropriate unsaturated flow model, the appropriate vegetation and the proper thickness of the cover, equivalency with prescriptive requirements could be shown. If the selected reuse alternative is a golf course at this location, it would not be a problem so long as the cover requirements are met, monitoring is performed, cover integrity is maintained, and human health and the environment are protected.

Regarding Site 17, generally we would not require installation of a liner beneath the site for landfill consolidation. However, under certain conditions (high groundwater, presence of hazardous waste, etc.), consolidation of the waste may not be allowed without additional requirements. We need site specific information to determine any other requirements for waste consolidation. When a work plan is submitted by the Navy, we will coordinate our review with the Waste Management Board.

If you have any questions, please call me at (909)-782-4998.

  
Lawrence Vitale  
DoD Section