

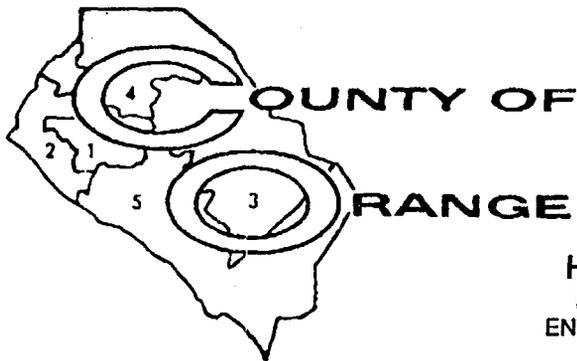
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MCAS EL TORO
SSIC # 5090.3

ARARs

TOM URAM
DIRECTOR

HUGH F. STALLWORTH, M.D.
HEALTH OFFICER

ENVIRONMENTAL HEALTH DIVISION
ROBERT E. MERRYMAN, REHS, MPH
DEPUTY DIRECTOR



HEALTH CARE AGENCY
PUBLIC HEALTH SERVICES
ENVIRONMENTAL HEALTH DIVISION
2009 E. EDINGER AVENUE
SANTA ANA, CALIFORNIA 92705-4720
(714) 667-3700

CTO-076/0290

June 11, 1996

Tayseer Mahmoud
Office of Military Facilities
Department of Toxic Substances Control, Region 4
California Environmental Protection Agency
245 West Broadway, Suite 425
Long Beach, CA 90802-4444

Subject: Orange County Health Care Agency's *Applicable or Relevant and Appropriate Requirements* (ARARs) at Hazardous Waste Contaminated Sites

Dear Tayseer:

You recently requested a list of our ARARs as they relate to MCAS El Toro. At this time, we have identified two ARARs that apply to all such sites within Orange County.

1. Groundwater Wells and Soil Borings.

The Orange County Code, Article 2, describes standards for the Construction and Abandonment of Water Wells. The intent of the Article is to ensure that groundwater within the County is not impaired in quality, that water obtained from such wells is suitable for its intended purpose, and that the water will not jeopardize the health, safety, or welfare of the people of this County. Proper construction and closure of these wells helps us to meet those goals. Complying with Article 2 is, therefore, a *substantive* requirement as defined in CERCLA.

In accordance with Article 2, Section 4-5-17, prior to construction or abandonment of any well, a written permit must be issued by the Health Officer. The information requested on a permit application is necessary to assist in tracking all monitoring wells and applicable soil borings in the county and to ensure that soil borings, well installations, and well abandonments are done properly. When issued, these permits generally require payment of a fee. Fee payment and issuance of a written permit are *procedural* requirements, as defined in CERCLA, that assist us in meeting the provisions of Article 2.

POST-IT FAX NOTE /6/1		Date 8/28	# of pages
To <i>Tim Lataas</i>	From <i>Roy Kaman</i>		
Co./Dept.	Co.		
Phone # <i>68-687 8848</i>	Phone # <i>310-590 5923</i>		
Fax # <i>-8787</i>	Fax # <i>-4932</i>		

Orange County Health Care Agency ARARs
 June 11, 1996
 Page 2

In order to expedite the process at hazardous waste-contaminated sites being overseen by Federal and/or State agencies, we agree to waive our *procedural requirements* (we will waive payment of the permit fee and issuance of the written permit) in order to obtain compliance with our *substantive requirements* (proper construction and closure of wells and applicable soil borings). To accomplish this smoothly, the permit application form must be completed and submitted to this office for review *prior to field work*. The information may either be submitted on the four-part application or on photocopies of its first page. We request that the permit applicant is a representative of the Federal or the State agency that is overseeing the site investigation or remediation activities.

2. Landfills.

Our agency is certified by the California Integrated Waste Management Board as the Orange County Solid Waste Local Enforcement Agency (LEA) in order to oversee landfill construction, operation, and closure. If any investigation involves landfills (active or inactive), then our office must be consulted prior to the activity. Presently, written notification must be provided to our office, the appropriate Regional Water Quality Control Board, and the South Coast Air Quality Management District. The notification must include a description of the proposed activity, which must be reviewed and approved prior to field work. Closed or closing landfills must follow the State requirements for Clean Closure (see attached guidelines). Presently there is no fee for our solid waste consultative services.

Thank you for your attention to this matter. If you need more information regarding wells, borings, or permits, please contact Larry Honeybourne, Supervisor of our Water Quality Section, at (714) 667-3750. If you need more information regarding landfills, please contact Patti Henshaw, Supervisor of our Solid Waste Section, at (714) 667-2014.

Sincerely,

Denise Fennessy

Denise Fennessy, Supervising Hazardous Waste Specialist
 Environmental Health Division

- Attachments:
- County Requirements for Well Permits
 - Orange County Code, Article 2
 - Application for Well Construction Permit
 - Application for Well Destruction Permit
 - Well Destruction Specifications
 - Destruction of Monitoring Wells and Soil Borings
 - LEA Advisory #16: Clean Closure

} Attached
 to June 11
 submission
 to you.

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POTENTIAL ARAR's

4 pages

Post-it [®] Fax Note	7671	Date	8-28-86	# of pages	▶
To	Tim Catas	From	Roy Yeamon		
Co./Dept.		Co.			
Phone #	67-687 8848	Phone #	30-590 5923		
Fax #	- 8787	Fax #	- 4932		

Source ¹	Standard, Requirement, Criterion, or Limitation	ARAR Status	Description	Comment
66264.14(a)	security requirement	relevant	prevent the unauthorized entry of persons or livestock	
66264.18 (a) (b)	seismicity standard floodplain requirement	relevant relevant	location specific	
66264.19(a,c)	landfill construction standards	relevant	ensures the proper construction of landfills	
66264.25	Design standards to meet seismic and precipitation requirements	relevant	landfill standard to function during 24 hour maximum precipitation storm; and withstand maximum credible earthquake.	
66264.51 66264.52(b)	action specific	TBC	requirement that proper action be taken in event of landfill failure	FS or Proposed Plan should discuss who and what action will be taken if the landfill fails e.g. washout of sites 2 or 17
66264.97 to 66264.100	general water quality standard, and detection monitoring, evaluation monitoring and corrective action for maintaining water quality standard	relevant	establish a groundwater monitoring program to protect and remediate groundwater contamination from landfills	Sites 2 and 17 have "hits" in soil and vapor which may produce leachate contaminating groundwater. Site 2 has already "hits" of contamination in groundwater
66264.117 (a-d), (f)	requirements for the care and use of property	relevant	specifies the care and/or use of the landfills.	
66264.301 (a-i), (k,l)	requirements for landfill extensions	relevant	specifies for leachate collection, liner, run-on and -off, and particulate matter control	relevant if planning to extend the landfills boundaries.
66264.302, 66264.303(a,b) 66264.304	requirement for having a liner with leak detection and response plan for excessive leachate	relevant	monitoring for generated leachate	relevant if extend the landfills boundaries.



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POTENTIAL ARAR's

Source ¹	Standard, Requirement, Criterion, or Limitation	ARAR Status	Description	Comment
66264.309	requirement	relevant	maintain records about the landfills	as much information collated on the landfills should be part of the record
66264.310	closure and post closure care requirements	relevant	cap requirements, maintenance requirements	

1. Source is the California Code of Regulations, Title 22