

CTO - 096/0293

State of California

Memorandum

To: Mr. Tayseer Mahmoud
245 West Broadway, Suite 350
Long Beach, CA 90802

Date: August 19, 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: REQUEST FOR REGIONAL WATER QUALITY CONTROL BOARD (RWQCB)
APPLICABLE RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs) FOR
MARINE CORPS AIR STATION (MCAS) EL TORO OPERABLE UNIT 2B AND
2C (LANDFILLS)

On August 12, 1996, we received your request that the Santa Ana RWQCB provide its ARARs for MCAS El Toro OU-2 B and OU-2C in compliance with Section 121 (d) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The following is a list of our ARARs:

• **Water Quality Control Plan Santa Ana River Basin, 1995 (Basin Plan)**

Citation: Chapter 3, Beneficial Uses

Description: Defines beneficial uses for groundwater beneath MCAS El Toro as: municipal and domestic supply, agricultural supply, Industrial service supply, and industrial process supply.

Comments: The identification of the groundwater as potential drinking water source (municipal) forms a basis for selection of concentration limits, cleanup levels and treatment levels.

ARAR Status: Applicable, Action

Citation: Chapter 4, Water Quality Objectives

Description: Defines the groundwater quality objectives for non-degradation, taste and odor, bacteria, chemical constituents, toxic substances, radioactivity, and minerals.

Comments: Concentration limits, cleanup levels, treatment levels established for OU-2B and OU-2C must conform to the Basin Plan objectives.

ARAR Status: Applicable, Action, Chemical

Citation: Chapter 5, Implementation, Salt Balance and Assimilative Capacity - Lower Santa Ana Basin

Description: Describes the actions that are necessary to achieve the water quality objectives and protect beneficial uses of the regions surface and groundwaters.

Comments: Applies to control, removal or remedial actions associated with groundwater remediation at OU-2B and OU2-C.

ARAR status - Applicable, Action, Chemical

• **Statement of Policy with Respect to Maintaining High Quality of Waters in California**

Citation: State Water Resources Control Board Resolution No. 68-16

Description: Establishes policy on maintaining high quality of California's surface and groundwaters.

Comments: Affects discharges from treatment systems and migration of contaminated or polluted water into high quality waters.

ARAR status: Applicable, Action, Chemical, Location

• **Sources of Drinking Water Policy**

Citation: State Water Resources Control Board Resolution No. 88-63 and Regional Board Resolution No. 89-42

Description: Defines all ground and surface waters as existing or potential sources of drinking water with a few specified exceptions, (these exceptions are specified in chapter 3, Beneficial Uses, of the Basin Plan)

Comments: The identification of the ground waters beneath OU-2B and OU-2C as potential drinking water sources provides information to determine concentration limits, cleanup levels or treatment levels.

ARAR status - Applicable, Location

• **Porter-Cologne Water Quality Control Act**

Citation: California Water Code § 13000

Description: Defines the legislative intent to attain the highest water quality reasonable, considering all demands being made.

Comments: Basis for selecting background as the clean up goal.

ARAR status: Applicable, Action

Citation: California Water Code § 13176

Description: Requires that the analysis of any material be performed in a state certified laboratory.

Comments: For all investigations and remedial actions.

ARAR status: Applicable, Action

Citation: California Water Code § 13263

Description: Requires Regional Boards to prescribe waste discharge requirements implementing water quality control plans and consider beneficial uses, water quality objectives, other discharges, and nuisance prevention.

Comments: Removal and remedial actions must comply with substantive requirements.

ARAR status: Applicable, Action, Chemical, Location

Citation: California Water Code § 13750

Description: Requires an intent to drill notice to be filed with the State Department of Water Resources for water wells, monitoring wells, and cathodic protection wells.

Comments: Applies to all well installations.

ARAR status: Applicable, Action

Citation: California Water Code § 13751

Description: Requires well completion reports to be submitted to the State Department of Water Resources.

Comments: Proposals for addressing OU-2B and 2C may include well installation.

ARAR status: Applicable, Action

• **Discharge of Waste to Land, Chapter 15, Title 23, California Code of Regulations Article 5 - Water Quality Monitoring and Response Programs**

Citation: § 2550.0

Description: Applies to any area of land in which waste was discharged. The duration is until the unit has been in compliance with the water quality protection standard for three consecutive years.

Comments: Applies to OU-2B and 2C past landfill operations

ARAR status: Relevant and Appropriate, Action

Citation: § 2550.4

Description: Concentration limits must be established for groundwater, surface water, and the unsaturated zone. They must be based on background, equal to background, or for corrective actions, may be greater than background, not to exceed the lower of the MCL or the concentration technologically or economically achievable.

Comments: Applies to all groundwater, surface water and unsaturated zone contamination sites.

ARAR status: Applicable, Action, Chemical

Citation: § 2550.5

Description: Monitoring points (MPt) and Point of Compliance (POC) - shall be specified in the requirements (ROD). POC is the vertical surface located at the downgradient edge of the unit (in this case the regional plume) extending through the uppermost aquifer. MPts shall be at the POC and other areas as determined by § 2550.7. For contiguous units the POC may be downgradient of an area.

Comments: May apply to the prescriptive remedial action alternative proposal which includes monitoring for migration and contaminant concentration levels.

ARAR status: Applicable, Action, Location

Citation: § 2550.7(b)(3)

Description: Must submit Department of Water Resources well logs to the Regional Board.

Comments: For all wells.

ARAR status: Applicable, Action

Citation: § 2550.7(e)(1)

Description: All monitoring systems to be designed and certified by a registered civil engineer or geologist.

Comments: Applies to OU-2B and 2C monitoring proposals

ARARs status: Applicable, Action

Citation: § 2550.7(e)(13)

Description: Must collect groundwater surface elevation and field parameters each time a well is sampled.

Comment: Applies to groundwater monitoring protocol.

ARAR status: Applicable, Action

Citation: § 2580(a)(d)(e)

Description: Requires maintenance of waste containment facilities and precipitation and drainage controls and contaminated groundwater monitoring throughout the post-closure maintenance period. Requires installation of at least two permanent monuments from which the location and elevation of wastes, containment structures, and monitoring facilities can be determined throughout the post closure maintenance period. Describes vegetative cover requirements.

Comment: Applies to landfill closures.

ARAR status: Applicable, Relevant and Appropriate

Citation: § 2581

Description: Requires a final cover constructed in accordance with specific prescriptive standards, to be maintained as long as wastes pose a threat to water quality.

Comment: Groundwater impacts have been identified, which implies a potential threat to water quality.

ARAR status: Applicable, Relevant and appropriate

Citation: § 2597

Description: Closure post-closure maintenance plan to address potential adverse affects on the final cover.

Comment: Applies to closing solid waste disposal sites.

ARAR status: Applicable, Relevant and appropriate

Citation: California Water Code, Chapter 5, Article 1

Description: Requires cleanup and abatement of conditions of pollution or nuisance or threatened pollution or nuisance.

Comments: Applies to all investigation and remedial actions.

ARAR status: Applicable, Action

Policies and Procedures for Investigation and Cleanup and Abatement of discharges Under Water Code Section 13304

Citation: State Water resources Control Board Resoultion No. 92-49

Description: Requires the inveditigation, cleanup and abatement exent to any location affected by a discharge or threatened discharge and sets policies and procedures for all investigations and cleanup and abatement activities.

Comments: This is applicable to investigations and remedial activities at OU-2B and 2C.

ARAR status: Applicable, Action, Chemical, and Location

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

Sincerely;

Lawrence Vitale
DoD Section

cc: Mr. John Adams, SWRCB, Clean Water Programs