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MCAS EL TORO  
SSIC #5090.3



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

February 4, 1999

Mr. Joseph Joyce  
BRAC Environmental Coordinator  
AC/S Environmental (1AU)  
MCAS El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

Re: Supplemental EPA Comments on Draft Record of Decision (ROD), Operable Unit 2B,  
Landfill Sites 2 and 17, Marine Corps Air Station (MCAS) El Toro, CA

Dear Mr. Joyce:

This letter is a supplement to the United States Environmental Protection Agency's (EPA) comments dated January 29, 1999, on the above referenced document. I realize that the review period for the Draft ROD is officially over, however, EPA feels that the issue described below needs to be addressed prior to the submittal of a Draft Final ROD.

Although the draft ROD for Landfill Sites 2 and 17 contains monitoring and inspection requirements for groundwater, landfill gas and leachate, there are no such provisions for the Institutional Controls (ICs) or land-use restrictions that will also be utilized as part of the remedy. Since ICs will be such an important part of this remedy (and for Landfill Sites 3 and 5), EPA requests the Navy to include a section in the draft Final ROD on the monitoring of the land-use restrictions/controls.

This new section should state that a Land-Use Control Implementation and Certification Plan (LUCICP) outlining the monitoring and compliance steps necessary to achieve the land-use restrictions/controls established in the ROD, will be developed as part of Operations and Maintenance (O&M) for the landfill sites. The Navy shall also submit a draft LUCICP to the Federal Facilities Agreement (FFA) agencies, the Local Reuse Agency, the Local Enforcement Agency and the U.S. Department of the Interior for review.

At a minimum, the following elements of the LUCICP should be outlined in the draft Final ROD:

- 1) a description and the location of the Sites, including a map, a description of their approximate size and a description of any chemicals of concern;
- 2) the land-use control objectives and restrictions stated in the ROD;

- 3) the particular controls and mechanisms that will be used to achieve the ROD objectives and restrictions;
- 4) the inspection frequency of the Sites and surrounding areas;
- 5) the entities responsible for carrying out the monitoring/inspections;
- 6) the method(s) for certifying the condition of the Sites and surrounding areas;
- 7) the agency notification procedures (in case of remedy failure); and,
- 8) any other relevant information.

EPA is looking forward to working with you during the development of the LUCICP, therefore, please feel free to contact me if you have any questions and if you would like to arrange a meeting to discuss the elements of this monitoring plan.

Sincerely,



Glenn R. Kistner  
 Remedial Project Manager  
 Federal Facilities Cleanup Branch

cc: Patricia Hannon, RWQCB  
 Gregory Hurley, RAB Co-Chair  
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OPTIONAL FORM 99 (7-90)

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