

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

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OPTIONAL FORM 89 (7-90)

FAX TRANSMITTAL

of pages = 2

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TO Joseph JoyceFROM S. Ad

MCAS EL TORO

Dept./Agency

Phone #

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NSN 7540-01-317-7368

5099-101

GENERAL SERVICES ADMINISTRATION

March 27, 1996

Mr. William R. Mills Jr., P.E.
Orange County Water District
P.O. Box 8300
Fountain Valley, CA 92728-8300

DRAFT INTERIM ACTION FEASIBILITY STUDY REPORT, MCAS EL TORO

Dear Mr. Mills:

This is in response to your letter dated January 12, 1996, regarding our comments on the Department of Navy, Marine Corps Air Station El Toro, Draft Interim Action Feasibility Study report. In your letter, you requested clarification regarding the applicability of State laws and regulations for determining remedial action objectives at El Toro.

By letters dated January 22, 1996, and February 28, 1996, respectively, the U. S. EPA and the Department of Toxic Substances Control (DTSC), have already provided you clarification regarding this issue. Also, during a meeting with you on February 1, 1996, staff from the three agencies discussed the remedial action objectives for the shallow and principal aquifers at the MCAS El Toro and the applicability of State regulations. This letter reiterates our position on the issues you have raised.

All cleanup objectives must be protective of the beneficial uses of the water resources of the region. As you are aware, the Basin Plan designates municipal and domestic supply as one of the beneficial uses of the Irvine Subbasin. To protect this beneficial use, the remedial action objectives should be at or below the maximum contaminant levels (MCLs). Where the contaminant concentration in the plume is above the MCL, the responsible party must pursue active remediation of the plume. In areas where the contaminant concentration is at or below the MCLs, further cleanup may be technically and/or economically infeasible, and may not result in maximum benefit to the people of the State. In such cases, no-action or a passive alternative with monitoring of the site is an appropriate remedial action. These approaches are consistent with the Basin Plan, the Porter-Cologne Water Quality Control Act, and State Board Resolutions No. 68-16 and No. 92-49.

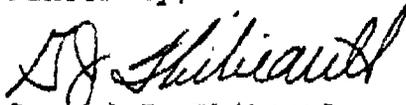
March 27, 1996

The State's requirements as stated in the Porter-Cologne Water Quality Control Act, the Basin Plan and State Water Resources Control Board policies and resolutions will be specified as State ARARs when the final remedial action for the aquifer is chosen. As indicated in the letter from DTSC, the responsible party must comply with all federal and state requirements that are determined to be ARARs.

Please note that the limited groundwater monitoring data that is currently available indicates that a major portion of the contaminant plume at MCAS El Toro is below the MCL. However, the monitoring data collected so far is not adequate to fully characterize the plume. Therefore, the MCAS El Toro has been requested to undertake additional monitoring at the site. The final decision on the remedial alternatives will be based on all the available information.

If you have any further questions, please contact me or Mike Adackapara at 909-782-3238.

Sincerely,



Gerard J. Thibeault
Executive Officer

cc: US Environmental Protection Agency, Region 9 - Jane Diamond
Department of Toxic Substances Control - John Scandura
Department of the Navy, SW Division - Commander Bill Dos Santos