



# California Regional Water Quality Control Board

## Santa Ana Region



**Terry Tamminen**  
Secretary for  
Environmental  
Protection

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**Arnold Schwarzenegger**  
Governor

M60050.003143  
MCAS EL TORO  
SSIC NO. 5090.3

June 30, 2004

Base Realignment and Closure  
Attn: Mr. F. Andrew Piszkin, P.E.  
BRAC Environmental Coordinator  
7040 Trabuco Road  
Irvine, CA 92618

**REQUEST FOR REGIONAL WATER QUALITY CONTROL BOARD (RWQCB)  
APPLICABLE RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs), FOR  
IRP SITE 8, DEFENSE REUTILIZATION AND MARKETING OFFICE STORAGE  
AREA, AND IRP SITE 12, SLUDGE DRYING BEDS, AT FORMER MARINE CORPS  
AIR STATION, EL TORO**

Dear Mr. Piszkin:

On May 27, 2004 we received your request that the Santa Ana RWQCB provide any additional ARARs for Sites 8 and 12 at MCAS El Toro in compliance with Section 121(d) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). We submit the following to you as ARARs for Sites 8 and 12:

**Water Quality Order No. 99-08-DWQ and the NPDES General Permit for Storm  
Water Discharges Associated with Construction Activity (General Permit)**

Citation: 40 Code of Federal Regulations parts 122, 123, 124 National Pollution Discharge Elimination System

Description: Construction and earth-moving activities that result in disturbances of at least one acre are subject to this permit. Such activities include, but are not limited to, clearing, grading, stockpiling and excavation of soil or other materials

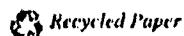
ARARs Status: Applicable, Action

**Title 27, California Code of Regulations**

Citation: § 20200 and § 20210

**received**  
7/5/04

**California Environmental Protection Agency**



Mr. F. Andrew Piszkin, P.E.

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**Description:** Requires that designated waste be discharge to Class I or II waste management units.

**Comments:** Applies to discharges of designated waste (nonhazardous waste that could cause degradation of surface or groundwaters) to land for treatment, storage, or disposal.

**ARARs status:** Applicable, Action, Chemical

**Citation:** § 21400

**Description:** Requires surface impoundments to be closed by removing and treating all free liquid and either removing all remaining contamination or closing the surface impoundment as a landfill.

**Comments:** This applies to the sludge drying beds at IRP 12.

**ARARs Status:** Applicable, Action

**Citation:** § 20385 – 20435

**Description:** Groundwater monitoring

**Comments:** Applies to all areas in which waste has been discharged to land to determine the threat to water quality.

**ARARs Status:** Applicable, Action

**Citation:** § 20400 (Title 23, CCR Section 2550.7)

**Description:** Cleanup levels must be set at background concentration levels, or if background concentration levels are not technologically and economically feasible, then at the lowest levels that are economically and technologically feasible.

**Comments:** Applies to IRP 8 and 12. If water quality is threatened, this section applies in setting soil cleanup levels for all cleanups of discharges of wastes to land.

**ARARs status:** Applicable, Chemical, Action

**Citation:** § 20415

**Description:** Require general soil, surface water, and groundwater monitoring

*California Environmental Protection Agency*



Mr. F. Andrew Piszkin, P.E.

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Comments: Applies to IRP Sites 8 and 12. Applies to all areas in which waste was discharged to land.

ARARs Status: Applicable, Action

If you should have any questions, please call me at (909) 782-4494 or send e-mail to jbroderic@rb8.swrcb.ca.gov.

Sincerely,

  
John Broderick  
SLIC/DoD Section

cc via e-mail: Ms. Nicole Moutoux, US EPA Region 9  
Mr. Tayseer Mahmoud, DTSC, Office of Military Facilities  
Mr. Karnig Ohannessian, NAVFACENGCOM, Southwest Division

**California Environmental Protection Agency**

