



California Regional Water Quality Control Board

Santa Ana Region



Alan C. Lloyd, Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

M60050_003371
MCAS EL TORO
SSIC NO. 5090.3.A

May 3, 2005

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

COMMENTS ON TECHNICAL MEMORANDUM, PRE-DESIGN INVESTIGATION, OPERABLE UNIT 2C, IRP LANDFILL SITES 3 AND 5, FORMER MARINE CORPS AIR STATION, EL TORO

Dear Mr. Piszkin:

We have reviewed the above referenced document, dated February 2005, which we received on March 2, 2005. We have the following comments:

- **1.2.2 IRP Site 5**, third bullet, Page 1-13: Your memorandum concludes that the concentrations of volatile organic compounds and methane gas are not high enough to impact the ambient air quality at IRP 5. You further conclude that the remedial design does not require a landfill gas control system. Based on our experience in oversight of closure and post-closure conditions at numerous landfill sites, including old military landfills, a correctly constructed soil cover (landfill cap) will effectively prevent both the infiltration of rainwater into waste, and the upward migration of landfill gas from the waste. Thus, the concentrated gases are forced to move laterally beneath the soil cover to escape. For this reason, landfills that did not previously require landfill gas controls typically require those controls after a closure cover is installed. Please be aware that Site IRP 5 is likely to require landfill gas controls, at least for a period of time.

For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,


John Broderick
SLIC/DoD Section

cc via email: Mr. Richard Muza, US EPA, Region 9
Mr. Frank Cheng, DTSC, Office of Military Facilities
Mr. Karing Ohannessian, NAVFACENGCOM, Southwest Division

California Environmental Protection Agency

