



California Regional Water Quality Control Board

Santa Ana Region



Lloyd Ph.D.
Agency Secretary

3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 – FAX (951) 781-6288 – TTY (951) 782-3221
<http://www.waterboards.ca.gov/santaana/>

Arnold Schwarzenegger
Governor

M60050_003389
MCAS EL TORO
SSIC NO. 5090.3.A

July 6, 2005

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

COMMENTS ON DRAFT PROPOSED PLAN FOR CLOSURE OF TWO INACTIVE LANDFILLS AT FORMER MARINE CORPS AIR STATION, EL TORO

Dear Mr. Piszkin:

We have completed our review of the above-referenced document, dated May 2005, which we received on May 6, 2005. We have the following comments:

- **Page 3, Location Map**
Letters are missing from the labels on the map.
- **Page 4, second paragraph** – “Investigation results show that no chemicals that would be derived from landfill contents were found outside the site boundaries.”

Suggested revision:

The investigation results show that the chemicals that could be derived from the landfill contents were not found outside the site boundaries.

- **Page 4, third paragraph** – “VOCs were detected in soil gas sampling but no localized hot spot sources of landfill gases were found”.

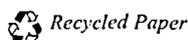
Suggested revision:

VOCs were detected in soil gas samples; however, localized hot spot sources of landfill gases were not found.

- **Page 4, fourth paragraph** – “It was expected that metals present in groundwater at the landfills would be reduced by natural precipitation.”

The above sentence seems out of place, and its meaning is unclear. Please review and revise as appropriate.

California Environmental Protection Agency



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- **Page 4, Column 2, second paragraph** – “Therefore, as a result of natural precipitation, no response action for groundwater was required.”

This sentence needs to be reworded or removed. The need for a response action is not based on the natural precipitation of the metals that are detected in the groundwater. The decision to require a response action is based on the source of those elevated metal concentrations, and the beneficial uses of the affected water body.

- **Page 4 Supplemental Site Characterization** – “Landfill gas (soil gas) monitoring wells were installed at the perimeter of the landfills to confirm the presence or absence of landfill gas and that landfill gas migration was not occurring, and to determine appropriate engineering and institutional controls to implement at Site 3 and 5.”

Suggested revision:

Landfill gas (soil gas) monitoring wells were installed at the perimeter of the landfills to confirm the presence or absence of landfill gas, and the possible migration of landfill gas; and to determine the appropriate engineering and institutional controls to implement at Sites 3 and 5.

- **Page 7, Risk Assessment Results, Groundwater, second to last sentence.**
See comment number 5.
- **Page 10 Alternative 4**
Please explain if you have a plan for managing water that may filter through the top two feet of soil and pool on the flexible membrane liner. We suggest the addition of a drainage layer.
- **Page 13, number 6. Implementability, last sentence**
The Navy has found during the designing of the caps for the other two landfills at the Station that they will need to import soil from an off-station source. Please explain your proposed on-station source for the appropriate soil for this project.
- **Page 17, Potential State ARARs, The California Regional Water Quality Control Board- Santa Ana Region**
Bullet number 6 - the reference cited pertains to construction quality assurance, not permeability requirements.

Mr. F. Andrew Piszkin, P.E.

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July 6, 2005

If you should have any questions, please call me at (951) 782-4494 or send e-mail 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