

*Admin Record  
El Toro*

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MCAS EL TORO  
SSIC NO. 5090.3.A



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

June 17, 2003

Mr. F. Andrew Piszkin  
BRAC Environmental Coordinator  
Base Realignment and Closure, Environmental Division  
MCAS El Toro  
7040 Trabuco Road  
Irvine, CA 92618

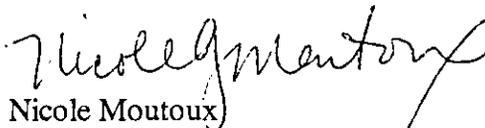
RE: EPA comments on the Draft Final Record of Decision for Operable Unit 3, Site 16, Crash Crew Training Pit No. 2, Marine Corps Air Station, El Toro, CA, dated May, 2003

Dear Mr. Piszkin,

EPA has reviewed the draft final Record of Decision for IRP Site 16 at the Marine Corps Air Station, El Toro. We have no further substantive comments on the ROD at this time. Please address the attached editorial comments prior to sending the final ROD for signature.

If you have any questions, please call me at (415) 972-3012.

Sincerely,

  
Nicole Moutoux  
Project Manager

cc: Rafat Abbasi, DTSC  
John Broderick, RWQCB  
Marc Smits, SWDIV  
Thelma Estrada, EPA  
Bob Woodings, RAB Co-Chair  
Marcia Rudolph, RAB Sub-Committee Chair

received  
6/24/03

EPA Comments on Draft Final ROD for Site 16

1. Pg.11-1, Section 11.2, Compliance with ARARs: First sentence states that remedial action will comply with the "substantive provisions of all ARARs." Since ARARs are by definition substantive standards, the phrase 'substantive provisions' is redundant and should be deleted.
2. Pg.11-6, Section 11.2.1.4, Surface Water Chemical-Specific ARARs: This section states that the NPDES Permit No. CAG918001 will be used as TBC guidance to comply with these ARARs. It is Region 9's policy not to refer to TBCs in the ROD. I would suggest that we change the phrase "TBC guidance to comply with these ARARs as discussed below" to "determine the substantive requirements and comply with the ARARs discussed below." Whenever TBC appears in the text and ARARs Tables, please delete and make the suggested change.
3. Pg.11-7, Section 11.2.1.4, Water Quality Control Plan, Santa Ana River Basin: Second sentence - "excepted for the Bee Canyon Wash" does not make sense. Is it "accepted?"
4. Pg. 11-9, Section 11.2.1.4, NPDES Permit Requirements: The last paragraph presents the DON's position regarding the site-specific NPDES Permit. DON states that it does not believe a site-specific permit is not necessary and that DON will comply with the substantive requirements of the general permit (NPDES Permit No. CAG918001). While EPA agrees that a permit is not required, DON has to comply with the substantive requirements of such a site-specific permit, not the general permit.
5. Page.11-12, Section 11.2.3.4, Institutional Controls: In the last paragraph, please delete the third sentence ("However, although US EPA does not agree....") In the fourth sentence, insert the specific regulation, i.e., 67391.1, after the word "regulation."
6. Pg.11-23,24, Table 11-2: EPA does not consider the DOT requirements as ARARs because they are requirements that do not apply to on-site activities. Please delete these DOT requirements in the ARARs Tables and put them in the text with an explanation that while DON does not consider these ARARs, DON will comply with these and all other off-site activities.
7. Pg.11-26, Table 11-2: SCAQMD 401 requirement seems out of place here. It should be part of the other Air requirements on p. 11-23.