



California Regional Water Quality Control Board Santa Ana Region



Linda S. Adams
Secretary for
Environmental Protection

3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 • FAX (951) 781-6288 • TDD (951) 782-3221
www.waterboards.ca.gov/santaana

Arnold Schwarzenegger
Governor

M60050_003654
MCAS EL TORO
SSIC NO. 5090.3.A

June 21, 2006

Base Realignment and Closure
Attn: Mr. Darren Newton
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, California 92618

COMMENTS ON REVISED DRAFT RECORD OF DECISION, OPERABLE UNIT 3A, SITES 8 AND 12, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: DOD100148400 & DOD100136300

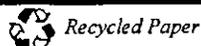
Dear Mr. Newton:

We have reviewed the above referenced document, dated May 2006, which we received on May 19, 2006. We have the following comments:

Board staff is developing a TMDL (total maximum daily load) for the Newport Bay and San Diego Creek watershed, to address the problem of sediments that are polluted with organochlorine compounds, including legacy pesticides DDT & metabolites, chlordane, & toxaphene and polychlorinated biphenyls (PCBs). The release of organochlorine compounds, including PCBs, to surface soil at Site 8, Site 12, and various other MCAS El Toro sites are among the known locations of spills within the San Diego Creek watershed. The cleanup of PCBs at Site 8 utilized a health based target cleanup goal of 0.288 milligrams per kilogram. The proposed sediment targets for San Diego Creek and tributaries are: total DDT – 6.98 micrograms per kilogram ($\mu\text{g}/\text{kg}$) dry weight (dw); chlordane – 4.5 $\mu\text{g}/\text{kg}$ dw; toxaphene – 0.1 $\mu\text{g}/\text{kg}$ dw; and PCBs - 34.1 $\mu\text{g}/\text{kg}$ dw.

Site 12 is located adjacent to and east of Bee Canyon Wash. Site 8 is located just west of Aqua Chinon Wash. One of the Units (No. 3) of Site 12 is the drainage ditch leading from Bee Canyon Wash up to Marine Way, the channel that drains the other units of Site 12. Upon the Regional Board's adoption of the proposed organochlorine compounds TMDL, PCB and legacy pesticide impacted soils at release sites such as Sites 8 and 12 will require application of best management practices to prevent impacted sediments, containing contaminant concentrations above their target limits, from entering tributaries to San Diego Creek. Appropriate storm water management will become necessary to maintain the current state of the property and to prevent impacts that could limit future uses.

California Environmental Protection Agency



received
6/26/06

Mr. Darren Newton

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June 21, 2006

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, U.S. EPA, Region 9
Ms. Soad Hakim, DTSC, Office of Military Facilities
Ms. Content Arnold, BRAC PMO WEST

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