

Adm'd RECORD
EL TORO



California Regional Water Quality Control Board Santa Ana Region



Linda S. Adams
Secretary for
Environmental Protection

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Arnold Schwarzenegger
Governor

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MCAS EL TORO
SSIC NO. 5090.3.A

January 10, 2006

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

COMMENTS ON DRAFT FINAL, RECORD OF DECISION (ROD), OPERABLE UNIT (OU) 3A, SITES 8 AND 12, FORMER MARINE CORPS AIR STATION, EL TORO, GEOTRACKER No. DOD100148400 & DOD100136300

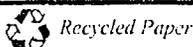
Dear Mr. Newton:

We have reviewed the above referenced document, dated November 1, 2006, which we received on November 20, 2006. As you are aware, on December 15, 2006 we requested a 30-day extension of the deadline for providing our comments on this document. We appreciate the additional time, and offer the following comments:

- The investigation results for Sites 8 and 12, as summarized in Section 5 of the ROD, indicated concentrations of polychlorinated biphenyls (PCBs) and legacy pesticides: DDT and metabolites; chlordane; and toxaphene. Site 8, Units 1 and 4, are reported as having PCBs and all three legacy pesticides in surface soils at concentrations above the Total Maximum Daily Limits (TMDL) target sediment concentrations that were identified for this Operable Unit, OU-3A. Site 8, Unit 5 and all four units of Site 12 also have PCBs, DDT and metabolites, and chlordane in surface soils at concentrations above the target sediment concentrations. Site 8, Units 2 and 3 have PCBs in surface soils at concentrations above the TMDL target sediment concentrations.

Formal adoption of the proposed implementation plan for the Organochlorine Compounds TMDL for the San Diego Creek Watershed, in the form of a Regional Board order, is expected in 2007. The U.S. Environmental Protection Agency promulgated TMDL sediment targets for: PCBs; DDT and metabolites; chlordane; and toxaphene on June 14, 2002. The OU-3A ROD does not propose a remedy to prevent impacts to surface waters from the transportation and erosion of sediments

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with concentrations of PCBs and legacy pesticides in excess of TMDL sediment targets.

- **Section 6.2, Surface Water Uses**, Page 6-1: The downgradient portions of the San Diego Creek Watershed are listed as impaired under the Clean Water Act. We disagree with your assertion that the previous investigation conducted at Site 25 [the assessment of four major drainage channels that resulted in a recommendation for "no further action" under Comprehensive Response Compensation and Liability Act (CERCLA)] constitutes a complete assessment of surface water impacts from the former Marine Corps Air Station. We believe a site-specific assessment of impacts to the Aqua Chinon Wash and Bee Canyon Wash is necessary for the protection of water quality.
- **Section 11. SELECTED REMEDY**, Page 11-1: We have no objection to or comment on the proposed excavation and removal of contaminated soil. Rather than supporting a proposal for no further action, we request a remedy for areas outside the proposed excavation zones, where concentrations of PCBs and legacy pesticides exceed the TMDL sediments targets, in order to prevent transport of and erosion of soils exceeding TMDL sediments targets.

We recognize that the soil cleanup standards for PCBs and pesticides that were implemented at Sites 8 and 12 were developed in accordance with a human health based risk assessment, as defined in CERCLA. As you know, we declined to comment on the development of soil cleanup standards during the period when the project progressed from investigation to the proposed plan. We did, however, express our concerns regarding residual contamination in our comments on the Draft ROD. Considering the proximity of Site 8 to Aqua Chinon Wash and Site 12 to Bee Canyon Wash, steps must be taken to prevent the transportation and erosion of soils in excess of the TMDL sediment targets.

Because of the Navy's imminent transfer of the property and the residual contaminants of concern in the soil at these sites, we are requesting that the ROD include a remedy to prevent soil transport and erosion. The remedy should be in place at the time of the property transfer, and maintained after the transfer is completed.

- **Section 12.2.1 Chemical Specific ARARs, 12.2.1.1 Federal**, Page 12-2: We request that Section 303(d) of the Clean Water Act be identified as an ARAR.

Please submit an electronic copy of the revised Record of Decision, and the copies of subsequent reports, soil and groundwater analytical data, surveyed locations of monitoring wells, and boring logs describing monitoring well construction to the State



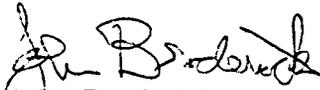
Mr. Darren Newton

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Water Resource Control Board's Geotracker website. 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: Richard Muza, U.S. EPA, Region 9
Quang Than, DTSC, Office of Military Facilities
James Callian, BRAC PMO WEST

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