



Cal/EPA

California
Environmental
Protection
Agency

*Integrated
Waste
Management
Board*

8800 Cal Center Dr.
Sacramento CA 95826
(916) 255-2200

APR 30 1996



Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

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MCAS EL TORO
SSIC NO. 5090.3.A

Mr. Tayseer Mahmoud
California Environmental Protection Agency
Department of Toxic Substances Control
Office of Military Facilities
Southern California Operations
245 W. Broadway, Suite 350
Long Beach, California 90802-4444

Subject: Review of Draft Phase II Remedial Investigation Report for Operable
Unit 2B - Site 2, Marine Corps Air Station, El Toro, California

Dear Mr. Mahmoud:

We have reviewed the subject document (six volumes) dated March 1996, prepared by Bechtel National, Inc., on behalf of the Department of the Navy. The California Integrated Waste Management Board (Board) staff have reviewed this submittal for conformance with Title 14, California Code of Regulations, Division 7 (14 CCR), Chapter 3, Article 7.8. These regulations consist of potential applicable or relevant and appropriate requirements for the Site 2 Landfill.

Based on our review we are providing the following comments:

1. Site investigation and sampling programs appear to be adequate for the purpose of initial site assessment. However, a waste characterization study may be required later on, if necessitated by the findings of the feasibility study, specifically, if a clean closure and/or consolidation of the landfill are considered.
2. Based on the information about negative impacts of the landfill on the environment (ground water contamination, gas migration, and soil contamination), an alternative addressing clean closure and/or waste consolidation should be considered for the purpose of the feasibility study. For your convenience, we have included a copy of Board's Local Enforcement Agency Advisory discussing the subject of clean closure which may be used as a guidance document in this matter.
3. The Remedial Investigation report does not include a discussion of potential impacts of ground water fluctuation and the landfill seep on landfill gas generation potential. As indicated during the April 24, 1996, meeting, ground water periodically rises into the waste fill and may, potentially, provide moisture necessary to generate landfill gas. Thus, the report should evaluate if such occurrence takes place at Site 2.



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Mr. Tayseer Mahmoud
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Should you have any questions regarding this matter, please call me at (916) 255-1195.

Sincerely,

A handwritten signature in cursive script, appearing to read "Janicki".

Peter M. Janicki
Closure and Remediation South
Permitting and Enforcement Division

Attachment