



Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection



July 10, 1997

California
Environmental
Protection
Agency

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
P.O. Box 95001
Santa Ana, California 92709-5001

Integrated
Waste
Management
Board

Subject: Follow-up to Review of Revised Draft Phase II Feasibility Study
Report and Related Documents for Operable Unit 2B - Site 2,
Marine Corps Air Station, El Toro, California

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

Dear Mr. Mahmoud:

On March 18, 1997, California Integrated Waste Management Board (Board) Closure and Remediation Branch staff received a submittal addressing revisions to Draft Phase II Feasibility Study Report for Operable Unit 2B, Site 2, Marine Corps Air Station (MCAS), El Toro. Subsequently, Board staff issued a review letter dated April 4, 1997, outlining the remaining landfill closure and postclosure issues needing more clarification.

In response to Board letter, your office had contacted Board staff on the telephone to resolve the outstanding issues. As a result of the conversation between myself, my supervisor Mr. Michael Wochnick, and yourself, Board staff have agreed that the project proponent would address staff comments during the design stage of the landfill closure. This agreement applies to the following items (as per numeration in the April 4, 1997 letter):

- ▶ Comment 1 - landfill gas sampling unit conversion.
- ▶ Comment 2 - multiple depth gas monitoring wells.
- ▶ Comment 3 - postclosure maintenance cost derivation method.
- ▶ Comment 4 - soil loss calculations.
- ▶ Comment 5 - drainage calculations.
- ▶ Comment 9 - in-situ waste quantification.
- ▶ Comment 10 - drainage system drawings.
- ▶ Comment 11 - landfill gas monitoring.


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- ▶ Comment 12 - landfill cap inspections.
- ▶ Comment A - postclosure-specific landfill maintenance procedures.
- ▶ Comment B - postclosure maintenance cost derivation method.
- ▶ Comment C - monolithic cover proposal submittal guidelines.
- ▶ Comment D - sources of low permeability material.

However, Board staff comment regarding institutional controls should be adequately addressed prior to the FS approval. As noted in the previous correspondence, the institutional controls should be derived from a specific remedy and established as an integral part of the landfill closure and postclosure maintenance. The language drafted by the Department of Toxic Substances Control (Land Use Restrictions, May 19, 1997), if inserted in the FS, would adequately address Board staff comment. In the event when no remedy-specific institutional controls are to be included, Board staff would have to reevaluate the proposed closure alternatives accordingly.

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

Sincerely,



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

cc: Mr. Tayseer Mahmoud, Department of Toxic Substances Control