



# California Integrated Waste Management Board

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MCAS EL TORO  
SSIC # 5090.3

Dan Eaton, Chairman

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Gray Davis  
Governor

Winston H. Hickox  
Secretary for  
Environmental  
Protection

June 17, 1999

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

Draft Record of Decision (ROD) for ~~Sites 3 and 5~~, El Toro Marine Corps Air Station (MCAS)

Dear Mr. Joyce:

On April 22, 1999, the California Integrated Waste Management Board (Board) Closure and Remediation Section staff received your submittal addressing Record of Decision (ROD) documentation. The submittal consisted of the following documents:

1. Draft Record of Decision, Operable Unit 2C, Landfill Sites 3 and 5, Marine Corps Air Station El Toro, California, dated March, 1999, and
2. Draft Responsiveness Summary Associated with the Record of Decision for Operable Unit 2C - Landfill Sites 3 and 5, dated April 1999.

Based on our review of these documents, we have the following comments.

1. Generally, the chosen final cover alternative for both landfill units (impermeable synthetic liner) appears to be adequate to provide sufficient environmental protection. However, the proposed conceptual design does not include all design elements allowing such cover to function efficiently. Specifically, not included are landfill gas conductive layer and/or features, subsurface drainage layer and protective working layer. Additionally, the text does not mention other features usually associated with synthetic membrane covers such as gas relief system designed to prevent a pressure buildup under a membrane. If these features are to be included during the design stage, they should be at least acknowledged in the ROD. Board staff reserve the right to reconsider our approval should you fail to include these features in the final design.
2. Board staff disagree with the conclusion of Section 5.1, Presumptive Remedy Approach, which states that the proposed synthetic liner was the result of site investigation and that the site investigation was aimed at choosing the most appropriate remedy. Board staff would like to point out that the proposed synthetic membrane for the two landfills is a result of lack of adequate site characterization and information on landfill gas generation potential combined with the proposed heavily irrigated postclosure land use.
3. The ROD does not include a description and/or drawing depicting landfill property boundaries to be used for the purpose of landfill gas off-site migration monitoring and enforcing postclosure maintenance and land use control. We request that this issue be resolved prior to signing the ROD and also reflected in the institutional control program.

California Environmental Protection Agency

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Should you have any questions regarding this matter, you can contact me at (916) 255-1302 or Mr. Peter Janicki of my staff at (916) 255-1302.

Sincerely,



Michael B. Wochnick, Manager  
Closure and Remediation Section  
Permitting and Enforcement Division

cc: Mr. Tayseer Mahmoud  
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