



County of Orange

Public Facilities & Resources Department

John W. Sibley, Director

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MCAS EL TORO
SSIC #5090.3

May 19, 1999

Mr. Joseph Joyce
BRAC Environmental Coordinator
Naval Facilities Engineering Command
Southwest Division – Code 05BM.JJ
1220 Pacific Highway
San Diego, California 92132-5187

Dear Mr. Joyce:

I appreciated the opportunity to meet with you and your team on May 13, 1999 to discuss the relationship between landfill # 2 and future Alton Parkway. The meeting helped us understand the difference between selection of a remedy for landfill closure and design detail. I hope the meeting helped your team understand the impacts the landfill remedy and closure design will have on future County property and construction of Alton Parkway. Our objective is to ensure that the landfill remedy and design will 1) control landfill gas from migration onto future County property, 2) fully consider and accommodate the future construction of Alton Parkway and Borrego Canyon Wash as planned, and 3) will remediate any plumes of contaminated groundwater which may be encountered during construction of Alton Parkway. I have attempted to summarize several of the issues discussed on May 13, 1999 and formulate reasonable actions in order to clarify some of the responsibilities between County, State and Federal agencies:

Landfill Gas

The federal government will be responsible for establishing a boundary beyond which they will control the migration of landfill gas. This boundary will be established by the installation of a gas probe system to be maintained and monitored by the federal government. The establishment of a 1,000' buffer for this purpose does not apply to this site because it is an unpermitted site. The landfill remedy and design will include a landfill gas collection system if necessary to prevent migration of gas beyond the established perimeter. The gas probe system will be installed during the design phase and a collection system will be installed concurrently with installation of the landfill cap, if necessary. The federal government will fully coordinate the design of the gas probe system and monitoring data with County.

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Borrego Canyon Wash

The landfill remedy and design will include a suitable hydrologic and hydraulic analysis to ensure that both the landfill and future Alton Parkway are protected against future flooding and erosion from Borrego Canyon Wash. The County will provide a set of Alton Parkway construction plans so the federal government may adequately design channel improvements necessary to protect the landfill against erosion. Channel improvements shall be made by the federal government to Borrego Canyon Wash to protect landfill #2 which adequately conveys storm flows with encroachment of Alton Parkway into the watercourse in accordance with current plans. The Orange County Public Facilities and Resources Department will review and approve plans for any improvements within Borrego Canyon Wash to ensure compatibility with County standards.

Contaminated Groundwater

The current remedy does not propose to treat any contaminated groundwater plume emanating from the landfill. It is fully expected, however, that future County excavation for Alton Parkway and Borrego Canyon Wash will require dewatering activities regulated by the California Regional Water Quality Control Board. It was stated at the meeting that the federal government would be responsible for treating any contaminated ground water encountered during County construction activities. A landfill closure fund should be budgeted and funds set aside to mitigate County costs related to the landfill groundwater contamination.

Although the Navy has assured us that the details mentioned above will be further determined and coordinated during design, I believe the responsibility should be addressed through Responsiveness Summary and documented in the Final Draft Record of Decision. I realize that the review period for the draft ROD is officially over, however, the County feels that the issues described above and the Navy's commitment to resolve them need to be addressed prior to submittal of a Draft Final ROD.

I look forward to continuation of the dialog begun at our recent meeting.

Very truly yours,



Kenneth R. Smith
Deputy Director/Chief Engineer

BRAC OFFICE

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