



California Regional Water Quality Control Santa Ana Region

M60050.000127
MCAS EL TORO
SSIC #5090.3

Winston H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

August 19, 1999

Mr. Dean Gould
BRAC Environmental Coordinator
Base Realignment & Closure, Environmental Div.
P O Box 51718
Irvine, CA 92619 -1718

DRAFT RECORD OF DECISION, OPERABLE UNIT 3A, SITES 8, 11, 12, MARINE CORPS AIR STATION, EL TORO

Dear Mr. Gould:

We have completed our review of the above document dated June 1999. We have the following comments.

Page ,1 Declaration, Description of Remedy

"No further action is recommended at Site 8 (units 1, 2, 3, and 4) Site 11 (unit 3) and Site 12 (unit 1, 2, and 4) because the concentration of contaminants in soil are low and risks to human health are within the range considered generally acceptable by U. S. EPA."

Please explain whether or not evaluations were made to determine if the concentration of contaminants pose a risk to groundwater and what these evaluations consisted of.

Page 1-13, 2nd paragraph

According to the Water Quality Control Plan, Santa Ana River Basin, El Toro MCAS is situated over the Irvine Pressure Groundwater Subbasin.

Page 5-11, Figure 5-3, Analytes Identified in Phase I and Phase II Soil Samples, Site 12 - Sludge Drying Beds

We request that different colors be used to signify the locations of where SVOCs/PAH and pesticides were detected. On the figure, the colors are the same for the two groups of chemicals.

Section 6, Summary of Risks

Same as our first comment. This section should also discuss whether or not these sites have had an impact on surface or groundwater and if there are any impact, how the selected remedy will address them.

Page 7-5, Section 7.3 Alternative 3 – Excavation With Recycling of Excavated Soil as Cover Material at the On-Station Site 2 or Site 17 Landfill

The residual concentrations of chemicals in the soils after excavation should be evaluated for their potential for migrating to surface water or groundwater. An explanation should be inserted in this section as to why the selected cleanup numbers are protective of surface water and groundwater.

We request that copies of the analytical results of the soil samples collected from the excavated soil be submitted to the Regional Board for review prior to placement of the soils on the landfills.

Page 7-10, Section 7.4.1 Alternative 4

Please explain how the liquids used for the soil washing will be stored and managed during the process and disposed of after the process is completed.

Page 7-10, Section 7.5

Please see comment above.

Page 9-1, Selected Remedy

We understand from discussions with your staff and U.S EPA that the Navy has decided not to dispose of the excavated on the landfills but to dispose of the soil at an appropriate off-site facility. If this is true, please make appropriate changes in the ROD.

Page 9-3

Stockpiles of contaminated soil should be protected from the weather to prevent the soil from being transported offsite by wind or rain.

If you should have any questions, please call me at (909) 782-4498.

Sincerely,

Patricia A. Hannon
DoD Section

cc: Dept. of Toxic Substances Control - Tayseer Mahmoud
Kutak Rock, Attorneys - Gregory F. Hurley (El Toro RAB Co-Chair)
Orange County Hall of Administration - Polin Modanlou
Orange County Health Care Agency - Steve Sharp
Naval Facility Engineering Command, SWDIV - Dave DeMars
State Water Resources Control Board, Clean Water Programs – John Adams
State Water Resources Control Board, Office of Chief Counsel – Ted Cobb
U. S. EPA, Region IX - Glenn Kistner