



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

5090
Ser 06CC.DG/023
January 14, 2000

RETURN CERTIFIED MAIL
Z 164 921 183

Ms. Tris Chesney
Department of Toxic Substances Control
Southern California Region
5796 Corporate Avenue
Cypress, CA 90630

Dear Ms. Chesney:

Pursuant to accomplishing the goals of the Marine Corp Air Station El Toro's Installation Restoration (IR) program outlined for Fiscal Year 2000, we are hereby requesting that the Department of Toxic Substances Control, as the lead agency for the State of California, identify potential State chemical-specific, action-specific and location-specific applicable or relevant and appropriate requirements (ARARs) for a potential Remedial Action at the following IR site: Site 16 - Crash Crew Pit #2. Enclosure 1 provides an overview of the tentative remedial alternatives to be evaluated in the Site 16 Feasibility Study.

In addition, the Department of the Navy (DON) is requesting that the State of California identify any other criteria, advisories, guidance and proposed standards that the State requests to be considered (TBCs) for the above identified IR site. Please coordinate responses from all California state agencies.

The DON is requesting timely identification of potential State ARARs consistent with Section 121 (d)(2)(A) of CERCLA and under the National Contingency Plan (NCP) 40 CFR §300.400(g) and §300.515(d) and (h). Experience to date around the country has shown that failure to identify ARARs with sufficient precision, early in the IR process, can cause severe disruptions in timely implementation of remedial/removal actions. To ensure timely and complete ARARs identification for the IR site listed above, please include the following information:

- a. A specific citation to the statutory or regulatory provision(s) for the potential State ARAR and the date of enactment or promulgation.
- b. A brief description of why the potential State ARAR is applicable or relevant and appropriate to the particular IR site.

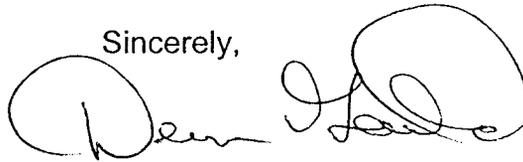
c. A description of how the potential State ARAR would apply to the potential remedial action, including: specific numeric discharge, effluent, or emission limitations; hazardous substance/constituent action or cleanup levels; and if the State intends to take the position that the potential State ARAR includes such limitations, levels, etc.

d. If the State believes its proposed ARAR is more stringent than the corresponding Federal ARAR, please provide the rationale and technical justification for this position.

e. If the State determines that there is not enough information to fully respond to our request, please identify any additional information that would be required to support identification of State ARARs and their application.

Consistent with 40 CFR §300.515(h)(2), we are requesting that you send a response via first class mail addressed to the undersigned and postmarked within 30 calendar days of receipt of this request. Please direct any technical questions to Ms. Content Arnold at (619) 532-0790, and any legal questions to Mr. Rex Callaway, Assistant Counsel (Environmental) at (619) 532-1662.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Gould", written over a large, circular scribble.

DEAN GOULD
BRAC Environmental Coordinator
By direction of the Commander

Enclosure:

(1) MCAS El Toro OU-3 Site 16
Feasibility Study Tentative Alternatives Overview

Copy to:

Mr. Glenn Kistner
U.S. Environmental Protection Agency
Region IX
Mail Code STD-8-2
75 Hawthorne Street
San Francisco, CA 94105-3901

Ms. Patricia Hannon
California Regional Quality Control Board
Santa Anna Region
3737 Main Street, Suite 500
Riverside, CA 92501-3339

MCAS EL TORO OU-3 SITE 16 FEASIBILITY STUDY TENTATIVE ALTERNATIVES OVERVIEW

- Alternative 1 – No Action
- Alternative 2A – Multi-Phase Extraction (MPE) With Vapor-Phase Granular Activated Carbon (VGAC) Treatment Of Extracted Vapors, Liquid-Phase Granular Activated Carbon Treatment (LGAC) Of Extracted Groundwater and Disposal of Treated Water Via Surface Water Discharge
- Alternative 2B – MPE With VGAC Treatment Of Extracted Vapors, Liquid-Phase Activated Carbon Treatment Of Extracted Groundwater and Disposal of Treated Water Via Publicly Owned Treatment Works
- Alternative 2C – MPE With VGAC Treatment Of Extracted Vapors, and Disposal of Extracted Groundwater Via Private Water Purveyor
- Alternative 2D – MPE With VGAC Treatment Of Extracted Vapors, Air Stripping Treatment of Extracted Groundwater and Disposal Of Treated Water Via Surface Water Discharge
- Alternative 2E – MPE With VGAC Treatment Of Extracted Vapors, Air Stripping Treatment of Extracted Groundwater and Disposal Of Treated Water Via Publicly Owned Treatment Works
- Alternative 3A – MPE With Thermal Oxidation Treatment Of Extracted Vapors, Granular Activated Carbon Treatment Of Extracted Groundwater And Disposal Of Treated Water Via Surface Water Discharge
- Alternative 3B – MPE With Thermal Oxidation Treatment Of Extracted Vapors, Liquid-Phase Activated Carbon Treatment Of Extracted Groundwater And Disposal Of Treated Water Via Publicly Owned Treatment Works
- Alternative 3C – MPE With Thermal Oxidation Treatment Of Extracted Vapors and Disposal of Extracted Groundwater Via Private Water Purveyor
- Alternative 3D – MPE With Thermal Oxidation Treatment Of Extracted Vapors, Air Stripping Treatment of Extracted Groundwater And Disposal Of Treated Water Via Surface Water Discharge
- Alternative 3E – MPE With Thermal Oxidation Treatment Of Extracted Vapors, Air Stripping Treatment of Extracted Groundwater And Disposal Of Treated Water Via Publicly Owned Treatment Works

Enclosure (1)

SOUTHWESTNAVFACENGCOM
Code 06CC.LMH
1220 Pacific Highway
San Diego, CA 92132
Telephone: (619) 532-0783/Fax: (619) 532-0780

2 Copies

File: areltoro.doc

TRANSMITTAL

Date: 7 February 2000

From: Lynn Marie Hornecker
MCAS El Toro

To: Diane Silva
Code 01LS.DS

Subj: CERCLA Administrative Record Materials
Marine Corps Air Station, El Toro

Installation: Marine Corps Air Station, El Toro

UIC Number: M60050

Document Title (or subject): Request for ARARs for IRP Site 16

Author: Dean Gould, SWDIV

Recipient: TRISS Chesney, DTSC

Record Date: 14 January 2000

Approximate Number of Pages: 3

EPA Category: 01.1

Sites: 16

Key Words: ARARs

Contract: N/A

CTO Number: N/A