

# Memorandum

**To:** Mr. Juan M. Jimenez  
Department of Toxic Substances Control  
245 West Broadway, Suite 350  
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**Date:** June 27, 1995

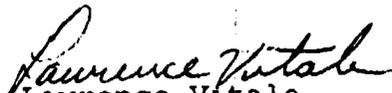
**From:** CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION  
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**Subject:** Draft Engineering/Cost Analysis (EE/CA) For Sites, 4, 7, 11, 13, 14, Unit 2 of 19, and Site 20 For Marine Corps Air Station El Toro

We have reviewed the subject documents dated April and May 1995 and received by us on June 1, and June 7, 1995 respectively. The EE/CA deal with soil contamination sites and proposed removal actions for remediation of those sites. The remedial actions include thermal desorption for the petroleum contaminated soils and excavation and offsite landfill disposal for the lead and PCB contaminated soils. We have the following comments on the EE/CA proposals:

1. The EE/CA states that if all contamination above Risk Based Concentrations has not been removed at the specified depth, then a liner may be installed to separate contaminated soil from clean backfill material and the contaminated soil would be addressed at a later date. We recommend that it would better to address all the contaminants before backfilling. Any backfilling should be done with regulator oversight.
2. At all lead contaminated sites, soil will be excavated and disposed of at a Class I landfill. Title 23, Section 2581, allows the use of contaminated soil as a foundation layer (depending on STLC values) for a landfill final cover. Since MCAS El Toro has landfills proposed for capping and closure, we suggest that this option be considered as an alternative to Class I landfill disposal.
3. If the cleanup objective is based on a residential scenario, then will the higher lead cleanup levels proposed at depths greater than 2ft. be protective enough, or is this proposal based on another less restrictive cleanup scenario?

If you have any questions, please call me at (909) 782-4998.

  
Lawrence Vitale  
DoD Section