

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

245 West Broadway, Suite 350

Fresno, CA 90802-4444

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MCAS EL TORO
SSIC # 5090.3

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December 14, 1994

Commanding General
AC/S Environment Code 1AU
Ms. Leta L. Suarez
Marine Corps Air Stations El Toro
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Ms. Suarez:

ACTION ITEMS FROM BASE CLOSURE PLAN RED LINE MEETINGS, DECEMBER 5 AND 6, 1994

Per your request at the Base Closure Plan (BCP) Red Line meeting of December 6, 1994 the Department of Toxic Substances Control (Department) has reviewed the Generator requirements in California Code of Regulations (CCR), Title 22, on the appropriate term to use for less than 90 day accumulation areas versus Satellite Accumulation Areas (SAA).

The CCR address this issue in section 66262.34 et al., Accumulation Time. The term less than 90 days accumulation area or Temporary Accumulation Area (TAA) is more appropriate for the activities described at the meeting. Feel free to make the necessary revisions to the BCP as discussed at the meeting and during our phone conversation of December 7, 1994. As a point of clarification, the Department's main concern is that, residual contamination should be completely addressed prior to the closure of the Marine Base, resulting from spills during day to day activities. The Department would like to see that any risks posed by these TAA's are addressed and the actions documented.

Another action item was the form Mr. Jacques Lord, of Bechtel National, will be using for the follow up RCRA Facility Assessment (RFA). The form was faxed to Mr. Lord on December 7, 1994. Copies are available upon request.

The third action item concerned the reuse designation for category 6 or 7 for the Operable Unit 3 sites. Either one is acceptable. Category 6 is preferable since some investigation have taken place in the past.

We look forward to working with you on these and other issues. Feel free to contact me at (310) 590-4919.

LLSUAREZJJ



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Ms. Leta L. Suarez
December 14, 1994
Page 2

Sincerely,



Juan M. Jimenez
Remedial Project Manager
Region 4, Base Closure Unit
Office of Military Facilities

cc: Mr. Ron Okuda
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Ms. Leta L. Suarez
December 14, 1994
Page 3

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