



California Regional Water Quality Control Board

Santa Ana Region



Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb8>
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Gray Davis
Governor

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov/rwqcb8.

May 8, 2001

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MCAS EL TORO
SSIC #5090.3

Mr. Dean Gould
BRAC Environmental Coordinator
MCAS El Toro
P.O. Box 51718
Irvine, CA 92619-1718

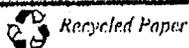
COMMENTS ON DRAFT CONSTRUCTION QUALITY CONTROL PLAN, REMEDIAL ACTION OPERABLE UNIT 2B, LANDFILL SITES 2 AND 17, FORMER U. S. MARINE CORPS AIR STATION, EL TORO

Dear Mr. Gould:

We have completed our review of the above reference document, dated February 2001, which we received on February 6, 2001. We have the following comments on this report:

1. **Section 2.3 Remedial Design and Oversight Contractor**, Page 2-1: Section 20324, Title 27 of the California Code of Regulation (27 CCR) requires a construction quality assurance (CQA) program, which should include all aspects of construction quality control (CQC). The professionals that draft the design and supervise the program shall be either registered civil engineers or certified engineering geologists.
2. **Section 3. TRAINING AND PERSONNEL QUALIFICATIONS**, Page 3-1: Section 20324(c)(1)(B), 27CCR requires identification of experience and training of the personnel working on containment design and implementation. Please revise this section to include the level of information described in the regulations.
3. **Section 6. DOCUMENTATION**, Page 6-1: Section 20324(d), 27CCR identifies specific report types and minimum report contents. Please revise this section to ensure that minimum requirements of the regulations are addressed in project reports. Additionally, we are expecting the CQA officer to submit Final Documentation for each landfill after closure is completed, as required in Section 20324(d)(1)(C).
4. **Section 6.1 DAILY REPORTS**, Page 6-1: We request that daily records of field activities (construction daily reports), including the processing and placement of soil, all proposed project revisions or design modifications, summaries of problems or difficulties encountered during construction, and results of CQA/CQC tests (including soil density, compaction, particle size analysis, Atterburg limits, moisture content, soil permeability, and testing of geosynthetic materials) be submitted to Board staff each day via FAX machine or e-mail. The office FAX number is (909) 781-6288; my

California Environmental Protection Agency



received
10 May 01

Mr. Dean Gould
OU-2B, Landfill Sites 2 And 17

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May 8, 2001

e-mail address is phannon@rb8.swrcb.ca.gov. **We request that the daily reports for each workday be submitted before noon on the following business day.**

5. **Section 7. QUALITY ASSURANCE/QUALITY CONTROL**, Page 7-1: Section 20324(c), 27 CCR contains specific minimum requirements for CQA/CQC testing protocols, testing frequencies, and criteria for various aspects of closure construction. This specificity is not included in the quality assurance/quality control plan which you submitted. Please revise this section adding specificity to meet the requirements of a CQA plan.

If you have any questions on this review or related matters, please call me at (909) 782-4498.

Sincerely,



Patricia A. Hannon
SLIC/DoD/AGT Section

cc: Ms. Nicole Moutoux, Environmental Protection Agency, Region IX
Ms. Triss Chesney, Department of Toxic Substances Control, OMF
Mr. Gregory F. Hurley, RAB Co-Chair, MCAS El Toro
Ms. Content Arnold, Naval Facilities Engineering Command, SWDIV

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