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October 29, 1996

Cal/EPA

Department of
Toxic Substances
Control

245 West Broadway,
Suite 425
Long Beach, CA
90802-4444

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
P. O. Box 95001
Santa Ana, California 92709-5001

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

**COMMENTS ON ACTION MEMORANDUM FOR REMOVAL ACTIONS
AT LANDFILL SITES 2 & 17, OPERABLE UNIT 2B, MARINE CORPS
AIR STATION (MCAS) EL TORO**

Dear Mr. Joyce:

The California Environmental Protection Agency (Cal/EPA) has completed the review of the above subject document dated October 1996. The memorandum documents the Department of Navy's decision to undertake Time-Critical Removal Actions at Site 2 (Magazine Road Landfill) and Site 17 (Communication Station Landfill) at MCAS El Toro. The actions are intended to provide security and to mitigate the erosion of landfill debris along surface drainage channels at the landfill sites.

This letter is to transmit the enclosed comments from California Integrated Waste Management Board dated October 22, 1996. If you have any questions, please call me at (310) 590-4891.

Sincerely,

Tayseer Mahmoud
Remedial Project Manager
Base Closure Unit
Office of Military Facilities
Southern California Operations

Enclosure

cc: See Next Page



cc: Ms. Bonnie Arthur
U. S. Environmental Protection Agency
Region IX
Hazardous Waste Management Division, H-9-2
75 Hawthorne Street
San Francisco, California 94105-3901

Mr. Lawrence Vitale
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
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Riverside, California 92501-3339

Mr. Peter Janicki
California Integrated Waste Management Board
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Sacramento, California 95826

Mr. Steven Sharp
County of Orange
Environmental Health Division
Solid Waste Local Enforcement Agency
2009 E. Edinger Avenue
Santa Ana, California 92705

Mr. Bill Sedlak
OHM Remediation Services Corp.
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San Diego, California 92132-5187



Cal/EPA

California
Environmental
Protection
Agency

*Integrated
Waste
Management
Board*

8800 Cal Center Dr.
Sacramento CA 95826
(916) 255-2200

OCT 22 1996



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James M. Strock
Secretary for
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Mr. Tayseer Mahmoud
California Environmental Protection Agency
Department of Toxic Substances Control
Office of Military Facilities
Southern California Operations
245 W. Broadway, Suite 350
Long Beach, California 90802-4444

Subject: Action Memorandum for Removal Actions at the Marine Corps Air Station, El Toro Installation Restoration Program (IRP) Site 2 (Magazine Road Landfill) and Site 17 (Communication Station Landfill), Marine Corps Air Station, El Toro, California

Dear Mr. Mahmoud:

California Integrated Waste Management Board (Board) Closure and Remediation staff have reviewed the aforementioned memorandum, dated October 4, 1996 and received on October 9, 1996.

Based on our review we are providing the following comments:

1. The Applicable or Relevant and Appropriate Requirements (ARARs) which were determined under Title 14 California Code of Regulations (14 CCR), Division 7, Chapter 3, should be identified as requirements for the purpose of the interim action identified in the Memorandum only. Additional ARARs addressing the design of final cover, construction quality control assurance, landfill gas monitoring and control and postclosure land use will have to be addressed in order to satisfy final closure requirements under 14 CCR standards.
2. Any activities related to waste relocation should be consistent with the final site configuration design and documented on appropriate drawings and in the text of the memorandum. Board staff also requests that the copies of the records of the waste relocation, including excavated waste characterization and volumetric measurements be submitted upon project completion (the memorandum should acknowledge this requirement, too). Additionally, a summary of this activity should be incorporated into the final closure document.



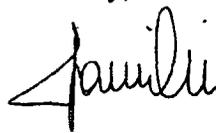
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Mr. Tayseer Mahmoud

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Should you have any questions regarding this matter, please call me at
(916) 255-1195.

Sincerely,

A handwritten signature in black ink, appearing to read "Janicki". The signature is written in a cursive style with a large initial "J".

Peter M. Janicki
Closure and Remediation South
Permitting and Enforcement Division