



California Regional Water Quality Control Board

Santa Ana Region



Winston H. Hickox
Secretary for
Environmental
Protection

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MCAS EL TORO
SSIC NO. 5090.3

April 19, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
Base Realignment & Closure, Environmental Div.
P O Box 51718
Irvine, CA 92619 -1718

DRAFT PHASE II FEASIBILITY STUDY, OU-3, SITE 16, CRASH CREW TRAINING PIT NO. 2, MARINE CORPS AIR STATION, EL TORO

Dear Mr. Gould:

We have completed our review of the above referenced document dated February 2000, which was received at this office on February 18, 2000. We have the following comments:

Page 1-9, Table 1-1 Summary of Soil Analytical Results for Site 16

Please explain why the maximum TPH as diesel concentration on this table is so much lower than the TPH as diesel concentrations on page 1-48, Table 1-16, Comparison of TCE Soil Gas Concentrations Versus Soil Concentrations of TCE, Total Petroleum Hydrocarbons and BTEX with Depth.

Page 1-23, Section 1.3.2 Physical Characteristics of the Site, last paragraph; Page A2-20, Section A2.2.1 Groundwater ARARS; Page A2-30, Section A2.3.2 State; Page A4-34, Table A4-2; Page A4-54, first paragraph

MCAS El Toro lies within the Irvine Forebay I Groundwater Basin.

Page 1-52, Table 1-8, Vadose Zone Soil Gas Concentration Threshold Calculations

Please explain why US EPA MCLs for benzene, ethylbenzene, toluene and xylene are used in these calculations when the California MCLs are more restrictive. The calculations should be done using the more restrictive MCLs. Please explain how the numbers in this table will be used.

Page 2-14, Table 2-4, Vadose Zone Soil Volume Calculations for Total Petroleum Hydrocarbons Beneath the Main Pit, Site 16

Please explain how the average TPH soil concentration was determined and if this TPH concentration includes all TPH compounds (gasoline, diesel, JP-5, motor oil and heavier ranges) or only diesel. In addition, please explain why the average TPH concentration in this table is higher than the maximum TPH concentration in Table 1-1, Summary of Soil Analytical Results for Site 16 (page 1-9).

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Page 2-12 Table 2-2 Vadose Zone Soil Gas Concentration Threshold Calculatlons

Some of the soil gas concentration threshold results are not correct. The MCLs listed are not all US EPA MCLs. Please correct this table.

Page 2-41, Table 2-10 Identification and Preliminary Screening of Remedial Technologies and Process Options for Collection, Treatment and/or Disposal of Contaminated Groundwater at Site 16

The Regional Board has streamlined the permitting process for discharges from groundwater treatment systems; the application process is simple and the authorization is fast. The discharge must meet the RWQCB's Basin Plan objectives for the receiving water.

Page A4-35 and A4-36 Table A4-2

Site 16 at El Toro MCAS is located in the Santa Ana Region; therefore, San Diego RWQCB Resolution Nos. 95-96 and 97-11 do not apply to this site.

General Comments

Based on our review of the map of the site and the proposed location for discharge of treated groundwater to Bee Canyon Wash via the storm drain system, the Navy will need to acquire a NPDES permit for the discharge, if they choose Alternative 2a , 2d, 3a, and 3d.

Comments on the ARARs Section

Although it is not necessary to resolve all issues in dispute at this stage in the development of a remedy, the Santa Ana Regional Water Quality Control Board would like to go on record as disagreeing with several conclusions with regard to ARARs that appear in the feasibility study for Site 16 at Marine Corps Air Station, El Toro.

1. The Navy misunderstands and incorrectly interprets State Board Resolution No. 68-16. The Resolution does apply to cleanup situations, contrary to the Navy's assertion. However, if we are ultimately satisfied with the Navy's selection of a cleanup alternative, it may be possible to simply agree to disagree on this issue.
2. The Navy misunderstands and incorrectly interprets State Board Resolution No. 92-49. The Resolution is more stringent than the Title 22 requirements, since it requires compliance with the State and Regional Board Plans and Policies and protection of beneficial uses, not just meeting MCLs. In addition, the Resolution applies throughout the area of contamination, not just at some "point of compliance." Again, if we are satisfied with the proposed cleanup levels the Navy selects for the final project, we can agree to disagree on this point as well.



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3. The Navy has decided that there is an appropriate point of compliance for measuring cleanup. That is not the case. Both Title 27, California Code of Regulations and Resolution No. 92-49 require the cleanup to occur throughout the area of contamination, not just at a predetermined point of compliance that is downgradient of the waste management unit. To that extent, the state requirements are more stringent than RCRA.

Thank you for the chance to comment on the feasibility study. We hope that our comments will be taken into account as the ROD is developed. If you should have any questions, please call me at (909) 782-4498.

Sincerely,



Patricia A. Hannon
SLIC/DoD/AGT Section

cc: Dept. of Toxic Substances Control - Triss Chesney
Kutak Rock, Attorneys - Gregory F. Hurley (El Toro RAB Co-Chair)
Orange County Hall of Administration - Polin Modanlou
Orange County Health Care Agency - Steve Sharp
U. S. EPA, Region IX - Glenn Kistner

