



California Regional Water Quality Control Board

Santa Ana Region



C. Lloyd, Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

M60050_003396
MCAS EL TORO
SSIC NO. 5090.3.A

November 2, 2005

Base Realignment and Closure
Attn: Mr. Darren Newton
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, CA 92618

**COMMENTS ON DRAFT RECORD OF DECISION (ROD), OPERABLE UNIT 2A, SITE 24 –
VOC SOURCE AREA, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB
GEOTRACKER ID: SLT8R2654056**

Dear Mr. Newton:

We have reviewed the above referenced document, dated August 2005, which we received on August 26, 2005. We have the following comments:

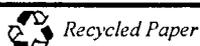
- **STATUTORY DETERMINATIONS**, Page 2: The determination states that “A five-year review will not be required for Site 24 soils... no hazardous substances, pollutants, or contaminants remain on-site in soil at concentrations that prohibit unlimited use and/or unrestricted exposure.” Within the statement it is acknowledged that a remedial action was operated under an interim ROD. Soil vapor extraction was implemented to reach remedial action goals. Remedial actions are reviewed to ensure that subsequent regulatory requirements that are appropriate or relevant and applicable (ARAR) have been implemented, and that the technical parameters used to determine the remedial action goals have not significantly changed in a manner that would require considering additional remedial action to the site. We believe that the five-year review is appropriate, as is the inclusion of the ARARs that were the basis for the selection of the SVE remedy applied to Site 24 soils.
- **5.1.2 Geology and Hydrogeology**, first sentence Page 5-2: The sentence refers to the Irvine Forebay I Groundwater Subbasin. Please revise this citation to be consistent with Section 6.2 **GROUNDWATER USE**, Page 6-2, recognizing the 2004 revisions to our Basin Plan. Please replace the term: “Irvine I Groundwater Subbasin” with “Irvine Groundwater Management Zone”.

For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,


John Broderick
SLIC/DoD Section

California Environmental Protection Agency



Mr. Darren Newton

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November 2, 2005

cc via email: Mr. Richard Muza, US EPA, Region 9
Mr. Frank Cheng, DTSC, Office of Military Facilities
Ms. Content Arnold, NAVFACENGCOM, Southwest Division

California Environmental Protection Agency



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