



# California Regional Water Quality Control Board Santa Ana Region

M60050\_003561  
MCAS EL TORO  
SSIC NO. 5090.3.A



Gray Davis  
Governor

John H. Hickox  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb8>  
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Phone (909) 782-4130 - FAX (909) 781-6288

*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](http://www.swrcb.ca.gov/rwqcb8).*

February 3, 2003

Mr. F. Andrew Piszkin, P.E.  
BRAC Environmental Coordinator  
MCAS EL Toro  
P.O. Box 51718  
Irvine, California 92619-1718

## COMMENTS ON DRAFT RECORD OF DECISION, OPERABLE UNIT 3, SITE 16 CRASH CREW TRAINING PIT NO. 2, FORMER MARINE CORPS AIR STATION, EL TORO

Dear Mr. Piszkin:

We have completed our review of the above reference document dated November 2002, which we received on December 2, 2002. We have the following comments on this report:

### DECLARATION

Petroleum hydrocarbons from fuels and oils burned and released are the most prevalent contaminant or pollutant at Site 16. Although identified in the investigation and decision document, evaluation and cleanup of these contaminants is not a component of this document. With the exception of certain petroleum hydrocarbons that are known carcinogens, petroleum hydrocarbons are not identified as contaminants of concern, have no cleanup goals proposed, and no remedial evaluation. We believe this release of petroleum hydrocarbons from fuel and other fuel sources has not been adequately characterized. As we have stated many times, release of petroleum hydrocarbons from this site requires an adequate investigation and may require remedial action. The Declaration must identify this site as an open petroleum corrective action site and should discuss planned activities for this site.

### 8.2.2.5 Site Grading, Page 8-6

The area requiring grading is not identified. Grading projects of five acres or larger require filing a Notice of Intent to obtain coverage under the statewide General Permit for Storm Water Discharges Associated With Construction Activity. This filing requirement will change to grading projects of one acre or larger on March 10, 2003.

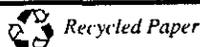
For any questions on this review or related matters, please call me at (909) 782-4494.

Sincerely,

  
John Broderick  
SLIC/DoD Section

received  
2/6/03

California Environmental Protection Agency



Mr. F. Andrew Piszkin,

-2-

February 3, 2003

cc: Ms. Nicole Moutoux, U.S. Environmental Protection Agency, Region IX  
Ms. Triss Chesney, Department of Toxic Substances Control, OMF  
Mr. Jerry Werner, RAB Co-Chair, MCAS El Toro  
Mr. Marc Smits, Naval Facilities Engineering Command, SWDIV

*California Environmental Protection Agency*



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