



# California Regional Water Quality Control Board Santa Ana Region



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Arnold Schwarzenegger  
Governor

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MCAS EL TORO  
SSIC NO. 5090.3.A

Linda S. Adams  
Secretary for  
Environmental Protection

May 11, 2007

Base Realignment and Closure  
Attn: Mr. Richard C. Weissenborn, P.E.  
BRAC Environmental Coordinator  
7040 Trabuco Road  
Irvine, California 92618

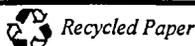
## COMMENTS ON REVISED DRAFT RECORD OF DECISION, OPERABLE UNIT 2C, LANDFILL SITES 3 AND 5, FORMER MARINE CORPS AIR STATION, EL TORO, GEOTRACKER NO. DOD100131300 & DOD100131400

Dear Mr. Weissenborn:

We have reviewed the above referenced document, dated April 2007, which we received on April 3, 2007. We have the following comments.

- Sections 1.6 **CURRENT AND FUTURE LAND USE**, page 1-4, and 7.2.2.1 **INSTITUTIONAL CONTROLS, Implementation, second paragraph, page 7-7**: When Lennar or another party assumes ownership of these landfill sites and responsibility for the postclosure care, the Regional Board will require waste discharge requirements to implement the postclosure requirements.
- **Section 9, SELECTED REMEDY, page 6-1**: Postclosure care and monitoring is critical for flexible membrane caps.
- **Section 10.2.1.1 GROUDWATER, second paragraph, page 10-2**: Tank Farm 5 is downgradient from Site 3. Tank Farm 5 has an associated benzene plume, but it is not the likely source of benzene beneath an upgradient site. It is more likely that fuels were disposed of in the landfill. Disposal of contaminated fuel in landfills was a common practice at military airfields. Benzene should remain as a contaminant of concern for Site 3.
- **Section 11, DOCUMENTATION OF SIGNIFICANT CHANGES, third bullet, page 11-2**: We strongly suggest that you reconsider maintaining only a 100-foot buffer from edge of the waste cell around the closed landfill. We believe that for maintenance, monitoring and response to cover repairs you will need space in excess of a strict 100-foot buffer. Within the fenced perimeter, you will need:
  - a. Vehicle access, parking, and staging areas for operation & maintenance monitoring;
  - b. Adequate room for storm water runoff control structures; and

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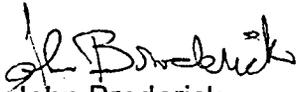
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c. For repair of cover failure(s) – heavy equipment access and material storage area(s).

- **Figure 7-2:** The northern portion of the proposed waste cell footprint after re-consolidation of Site 3 waste is located outside of the defined boundary of Site 3. Such an extension of that portion of the proposed waste cell will trigger the federal and State municipal solid waste siting regulatory requirements and all other applicable regulations, including a conforming liner.

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

Sincerely,

  
John Broderick  
SLIC/DoD Section

cc via email: Richard Muza, U.S. EPA, Region 9  
Quang Than, DTSC, Office of Military Facilities  
James Callian, BRAC PMO WEST