California Regional Water Quality Control Board
Santa Ana Region

Alan C. Lloyd, Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

March 16, 2005

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

COMMENTS ON DRAFT FINAL FEASIBILITY STUDY ADDENDUM, OPERABLE UNIT 2B, IRP SITE 2 GROUNDWATER, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: DOD100131200

Dear Mr. Newton:

We have reviewed the above referenced document, dated December 2005, which we received on December 20, 2005. We have the following comments:

We continue to fundamentally disagree with the ARARs (applicable or relevant and appropriate requirements) that you have selected for groundwater monitoring and groundwater protection standards for all landfill sites at the former air station. Your landfills are essentially municipal solid waste landfills, not hazardous waste landfills. We have repeatedly disagreed with your ARAR determinations that select State hazardous waste regulations over the applicable State solid waste regulations. The Site 2 landfill is currently undergoing construction of a closure cap in accordance with State and federal solid waste landfill regulations. We expect that the groundwater monitoring and groundwater protection standards for this unit would also be in accordance with State and federal solid waste regulations, not hazardous waste regulations. Regardless of similarities in the monitoring program between hazardous waste management units and solid waste management units, your determination to select State hazardous waste regulations over solid waste regulations is not consistent with your determination that the landfill is a solid waste unit.

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

Sincerely,

John Broderick
SLIC/DoD Section

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