



Department of Toxic Substances Control

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MCAS EL TORO
SSIC #5090.3



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Secretary for
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November 1, 1999

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SUMMARY REPORT FOR FORMER WATER TOWER STRUCTURE 373
(MSC W1) AND FORMER WATER TOWER STRUCTURE 222 (MSC W2) SITES,
MARINE CORPS AIR STATION, EI TORO

Dear Mr. Gould:

The Department of Toxic Substances Control has reviewed the above report dated August 12, 1999 and received by this office on August 30, 1999. The report presents documentation pertaining to the former water tower sites, MSC W1 and MSC W2 at the former Marine Corps Air Station, El Toro. An accidental release of mercury to the ground from a water level gauge at water tower MSC W2 was reported to have occurred prior to demolition of both water towers in 1993. The report describes the initial sampling activities, the removal of the contaminated soils, the confirmation sampling activities, and the evaluation of potential human health risks due to residual contamination at water tower MSC W2.

No further action status was proposed for water tower site MSC W1 in the March 1999 Base Realignment and Closure Cleanup Plan (BCP) because no mercury-containing gauges were located on that structure. The gauge for both towers was located on water tower MSC W2. In October 1998, the Navy performed preliminary field sampling activities at the MSC W2 site and verified that mercury concentrations at several locations exceeded the Preliminary Remediation Goals (PRG) issued by the United States Environmental Protection Agency, Region IX, in May 1998. The maximum reported mercury concentration at the site was 1,140 milligrams per kilogram (mg/kg), while the PRG for residential use is 22 mg/kg. Mercury is the only chemical of concern at the MSC W2 site.

The response action for the mercury was conducted in accordance with the spill response procedures in El Toro's Oil and Hazardous Substances Spill Prevention,

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Control and Countermeasures Plan and Oil and Hazardous Substances Spill Contingency Plan. The Navy conducted a field response action in December 1998 at the MSC W2 site to remove surface and subsurface mercury contaminated soil and perform confirmation soil sampling at the spill site. Review of the analytical results of the 14 confirmation soil samples collected from the excavation pit confirmed that all mercury-contaminated soil was excavated and the remaining residual concentration of mercury was below the residential PRG value of 22 mg/kg. The highest concentration of residual mercury in the excavation was detected at 2.9 mg/kg. Based on the review of the analytical results, no further excavation was conducted. The excavated area (approximately 20 feet by 30 feet by 4 feet deep) and concrete vault at the MSC W2 site was backfilled with clean soil. Approximately 140 cubic yards of mercury-contaminated soil was disposed of off-site at appropriate disposal facilities.

The field response action at the MSC W2 site to remove surface and subsurface mercury contaminated soil was successfully completed. Confirmation sampling analytical results did not detect any concentrations of mercury compounds above the EPA residential PRG. Background research on water tank MSC W1 verified that no mercury-containing gauge was associated with this tank, only with MSC W2. The MSC W2 excavation area was restored to original grade with clean soil.

Based on our review of the documentation and data presented, the Department of Toxic Substances Control concurs that sites MSC W1 (former elevated west water tower 373) and MSC W2 (former elevated east water tower 222) should be identified as "closed" and documented in the next BCP update.

If you have any questions, please contact me at (714) 484-5429.

Sincerely,



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cc: See next page

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TRANSMITTAL

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