



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

October 17, 1991

Larry Nuzum
Naval Facilities Engineering Command
Southwest Division
Code 1811
1220 Pacific Highway
San Diego, California 92132

Subject: Marine Corps Air Station, El Toro Responses to EPA
Review Comments on the RCRA Facility Assessment
Draft Preliminary Review Report
dated July 9, 1991

Dear Mr. Nuzum:

This letter transmits our comments on the Navy's response to the EPA comments on the Draft Preliminary Review Report. The response to these comments can be incorporated in the RFA Report.

If you have any questions regarding the attached comments or if you wish to discuss other matters related to the RFA, please contact John Hamill of my staff at (415) 744-2391.

Sincerely,

A handwritten signature in black ink that reads "John Hamill for".

Julie Anderson-Rubin, Chief
Federal Enforcement Section II

cc: Lt. Commander Serafini, USMCAS El Toro
Manny Alonzo, DHS
Ken Williams, RWQCB

GENERAL COMMENTS

Overall, the EPA review comments of 9 July, 1991 were adequately addressed by El Toro MCAS. A few comments are individually addressed below. At the end is a list of comments needing no further action.

1. Comment to El Toro Response #1

Known information prior to the VSI should be written out and summarized for each SWMU per the attached EPA Region IX RFA Report Format. The purpose of the VSI is to collect *additional* information and to update existing information.

According to the attached EPA Guidance for RFA Report Format, the acceptable format includes and/or addresses, for each SWMU, the following format items:

4.1 SWMU No 1 [Name of Unit]

4.1.1 Information Summary

- Unit Description
- Date of Start-Up
- Date of Closure
- Wastes Managed
- Release Controls
- History of Releases
- Remedial Action Taken
- Additional Information Needed/
to be Obtained from VSI
- Soil/Groundwater Release Potential
- Surface Water Release Potential
- Air Release Potential

Normally, this format is followed and presented in the PR.

The idea behind first conducting a PR with a VSI is that the PR summary is based on *written* records (file search and document review) and the VSI is based on *interviews* with knowledgeable personnel and *visual observation* of the units.

Because the VSI has already been performed, EPA will accept the PR without individual SWMU write-ups. However, this format should be followed and presented in the final RFA report.

2. Comment to El Toro Response #2

El Toro agreed with original EPA comment and will incorporate. When will a revised report be submitted to EPA? In the PR/VSI? In the final RFA?

3. Comment to El Toro Response #4

Same as General Comment #2; when will the revised report be submitted?

4. Comment to El Toro Response #6

See General Comment #1.

SPECIFIC COMMENTS

1. Comment to El Toro Response #2

Inadequate. Historical information needs to be expanded to include any changes in the number or usage of buildings, changes in waste stream or waste treatment practices, changes in mission, and changes to incorporate items that may affect SWMU identification and evaluation (such as aircraft maintenance and repair, equipment storage, product storage, number of base and residential personnel). What major commands and operations are at the facility?

2. Comment to El Toro Response #9

Acceptable. However, EPA would like to emphasize that, if the 22 RI/FS sites meet the definition of a solid waste management unit, they are SWMUs. If they do not meet this definition, they are categorized as AOCs. Some of the current 22 RI/FS sites may be classified as AOCs. Because this RFA is being conducted for the purposes of the RI/FS program, EPA will consider this acceptable. However, it does not exempt El Toro from future RCRA regulatory or permitting issues that may involve SWMUs at the facility.

3. Comment to El Toro Response #11

The statement to be added to the text regarding Bordier's Nursery should mention not only that the nursery is located off-site, but should also identify how far off-site (distance) and whether runoff from the nursery is (or has) drained to or is (or has been) found on-site at El Toro Marine Station. Also, identify why runoff from Bordier's Nursery would be associated with El Toro reports.

4. Comment to El Toro Response #13

Please add a statement in Response #13 to the appropriate section of the final RFA reports.

5. Comment to El Toro Response #14

Inadequate. Why is open burning/open detonation at the Explosive Ordnance Range not included in the RFA? EPA regulates open burning/open detonation as a RCRA activity. Such activity qualifies as a SWMU.

6. Comment to El Toro Response #15

This relates to original EPA General Comments #2 and #8 (May 1991) in that the record summaries included in Section 3 should cross-reference the appropriate SWMU number so that it is known when previously identified SWMUs are being discussed. See General Comments #2 and #8 (May 1991).

7. Comment to El Toro Response #17

Acceptable. The response indicates why EPA is concerned with using SWMU numbers to cross-reference units throughout the report so that the reader will know that a SWMU has previously been referred to.

8. Comment to El Toro Response #19

EPA still has concerns regarding discrepancies found in UST information that should be evaluated to the extent possible during the VSI.

9. Comment to El Toro Response #25

Based on the discussion on p. 3-48, the storm sewer should be evaluated for the *potential* (not known) of past discharges of photo processing wastes to the storm sewer. The text on p. 3-48 states that, prior to 1980, it is *unclear* what the policy was for handling photographic processing wastes. Thus, there is a potential for past discharges or releases.

10. Comment to El Toro Response #26

This information should be included in the appropriate SWMU descriptions.

11. Comment to El Toro Response #27

Acceptable; include a statement in the final RFA that "inferior water quality" is not defined and specific data was not available and past data consists of primarily wastewater parameters such as pH, sodium, nitrates, etc.

12. Comment to El Toro Response #29

See Specific Comment #7.

13. Comment to El Toro Response #35

Add a statement from Response #35 to the appropriate section (p. 3-54) of the RFA.

14. Comment to El Toro Response #36

Inadequate. Original EPA comment still applies. The geotechnical reports and soil borings are likely to contain relevant site-specific information.

15. Comment to El Toro Response #38

Please identify the location of each of the three land farming sites discussed on p. 3-57, Section 3.5.4. Add information to the final RFA report about the land farm operations, including length of operation. It has not been demonstrated in the PDPR report that the "nature of the contaminants and the activity at the SWMU are known." EPA disagrees with the statement that ". . . analytical results (even if available) would not provide information beyond what is already known." Please provide sampling information if available.

16. Comment to El Toro Response #41

Add a statement to final RFA report that Building 673 is permitted under RCRA *Interim Status*.

17. Comment to El Toro Response #42

Add a response to Specific Comment #42 to the appropriate section of the final RFA report.

18. Comment to El Toro Response #46

Acceptable. See Specific Comment #7.

19. Comment to El Toro Response #58

Acceptable (mainly because the area discussed is apparently off-site).

20. Comment to El Toro Response #60

Add a statement to the appropriate section of the report that the seepage pit at the Building 626 Steam Cleaning Area is part of the RI/FS Site 20 Hobby Shop.

21. Adequately addressed El Toro Responses with no further EPA Comments

El Toro Response #3, 5, 7, 8, General Comments Section.

El Toro Response #1, 3, 4, 5, 6, 7, 8, 10, 12, 16, 18, 20, 21, 22, 23, 24, 28,
30, 31, 32, 33, 34, 37, 39, 40, 43, 44, 45, 47, 48, 49, 59, 50, 51, 52, 53, 54,
55, 56, 57, 59, 61, 62 Specific Comments Section.