



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
ENVIRONMENTAL DIVISION
1220 PACIFIC HIGHWAY, RM 18
SAN DIEGO, CALIFORNIA 92132-5181

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MCAS EL TORO
SSIC # 5090.3

5090
Ser 1852.VG/150
March 4, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joe J. Zarnoch
Project Manager
State of California Environmental Protection Agency
Department of Toxic Substances Control, Region 4
Site Mitigation Branch
245 Broadway, Suite 350
Long Beach, CA 90802-4444

Re: IDENTIFICATION OF STATE APPLICABLE OR RELEVANT AND
APPROPRIATE REQUIREMENTS (ARARs) FOR THE REMEDIAL
INVESTIGATION/FEASIBILITY STUDY (RI/FS) FOR OPERABLE
UNIT (OU) 1, AT MARINE CORPS AIR STATION, EL TORO

Dear Mr. Zarnoch:

The purpose of this letter is to request that the Department of Toxic Substances Control (DTSC), as lead agency for the State of California, identify potentially applicable or relevant and appropriate requirements (ARARs) under State law for Marine Corps Air Station (MCAS) El Toro, Operable Unit (OU) 1, as provided under Paragraph 7.6(b) of the Federal Facility Agreement (FFA) and 40 CFR section 300.515 (h)(2). We acknowledge receipt of a preliminary list of potential State ARARs provided by your agency in March, 1991. On May 13, 1993 we wrote to you requesting a more specific identification of State ARARs for MCAS El Toro RI/FS. As of this date we have not received the requested information.

The Department of Navy (DON) has made a concerted effort during the past year to accelerate the schedule for OU 1 to reach a Record of Decision (ROD) well before the FFA deadline of December 20, 1995. The principal impetus for this acceleration has been the need to coordinate the remedial response identified for OU-1, which addresses potential contributions by MCAS El Toro to regional groundwater contamination, with concurrent plans by the Orange County Water District (OCWD) to extract 7 million gallons of groundwater per day from the aquifer immediately downgradient of the Station beginning in early 1996. An additional impetus is the Base Realignment and Closure (BRAC) program, under which MCAS El Toro is scheduled for closure in 1997.

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We urgently need your prompt and thorough cooperation to meet an ambitious schedule for the OU-1 feasibility study (FS). Since we plan to complete the FS for OU-1 this summer, it is imperative that the remedial actions evaluated in the FS thoroughly address State requirements. In addition, we have begun to schedule negotiations meetings with OCWD to discuss a settlement with regard to contaminants originating at MCAS El Toro. We want to ensure that the direction of our discussions is consistent with the ARARs identified for the OU-1 FS.

As you know, OU-1 has been defined as "groundwater on and off station that is contaminated with constituents that have migrated from sites at MCAS El Toro." Based on the results of the Phase I Remedial Investigation (RI), the groundwater that meets this definition is represented by the plume of VOCs emanating from sites in the southwest quadrant of the Station. The OU-1 FS currently under development addresses only the geographic extent and contaminants listed below:

Geographic Extent: Groundwater in the vicinity of RI/FS Sites 7, 8, 9, 10, 12, 13, 14, 15, 21, and 22 and groundwater downgradient throughout the extent of the TCE plume.

Contaminants:	1,1,2-Trichloroethane	1,1-Dichloroethene
	1,2-Dichloroethane	1,2-Dichloroethene
	Carbon tetrachloride	Benzene
	Chloromethane	Ethylbenzene
	Toluene	Tetrachloroethene
	Trichloroethylene (TCE)	Xylene

It is important to note that **the OU-1 FS will not address remediation of the source(s) of VOCs in groundwater.** This activity, as well as additional field investigations, will be performed in Phase II of the RI/FS and under other concurrent environmental programs at the Station, such as the investigation of contaminant source(s) in the vicinity of Sites 13, 14, and 15 under the California Leaking Underground Fuel Tank (LUFT) regulations.

To assist you in the identification of location-specific, chemical-specific, and action-specific State ARARs for the OU-1 FS, we are providing you the following information: (1) a map that depicts the groundwater contamination plume at MCAS El Toro; and (2) a list of alternatives that will be evaluated in the OU-1 FS.

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To ensure complete ARARs identification, we ask that you provide us the following information:

1. A specific citation to the statutory or regulatory provision(s) for the potential State ARAR and the date of enactment or promulgation.

2. A brief description of why the potential State ARAR is applicable or relevant and appropriate.

3. A description of how the potential State ARAR would apply to potential remedial actions, including: specific numeric discharge, effluent, or emission limitations; hazardous substance/constituent action or cleanup levels; if the State intends to take the position that the potential State ARAR includes such limitations, levels, etc.

4. If the State believes its proposed ARAR is more stringent than the corresponding Federal ARAR, please provide the rationale and technical justification for this position.

5. A description of any other criteria, advisories, guidance, and proposed standards that the State of California requests to be considered (TBCs) for OU-1.

As you know, timely identification of potential State ARARs is required under Section 121(d)(2)(a) of CERCLA and under the National Contingency Plan (NCP), 40 CFR Sections 300.400(g) and 300.515(d) and (h). Additionally, identification of ARARs is stipulated in paragraph 7.6 (a) & (b) of the Federal Facility Agreement (FFA) between the U.S. Environmental Protection Agency, the State of California, and the U.S. Department of the Navy; and in Section V.A.2.c of the 1990 Memorandum of Understanding between your agency, the State Water Resources Control Board, and the Regional Water Quality Control Boards.

Consistent with the above-cited provisions, we request that you send a response via first class mail addressed to me and post-marked within 30 calendar days of receipt of this request. If you have any technical questions concerning this request, please contact Andy Piszkin of my staff at (619) 532-2635. Legal

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questions should be directed to Rex Callaway, Associate Counsel (Environmental), SOUTHWESTNAVFACENGCOM, (619) 532-1662. Thank you for your prompt attention in this matter.

Sincerely,


W. A. DOS SANTOS, CDR, CEC, USN
Head, Facilities Management
By direction of
the Commanding Officer

Encls:

- (1) Map
- (2) Draft Alternatives

Copy to:

Commanding General
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MCAS El Toro
Santa Ana, CA 92709

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Blind copy to:

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MCAS EL TORO RI/FS
OPERABLE UNIT 1 - REGIONAL GROUNDWATER
DRAFT ALTERNATIVES

JANUARY 25, 1994

The following draft alternatives address groundwater contamination emanating from sites at MCAS El Toro that has migrated into the regional groundwater system. These alternatives are being evaluated in the OU-1 Feasibility Study now under development.

1. No Action

Conditions as they exist at present.

2. Orange County Water District (OCWD) Desalter Project

The Desalter Project as presented in the *Irvine Desalter Facility Plan Project Report and Cost Sharing Analysis (OCWD, 1992)*. The plans call for installation of several wells in the main production aquifer west and downgradient of MCAS El Toro to extract approximately 7.2 million gallons per day of groundwater. The extracted groundwater is treated to remove VOCs and further treated to be sold as potable water.

3-A. OCWD Desalter Project and Three On-Station Shallow Extraction Wells

The Desalter Project plus three additional, on-Station, shallow extraction wells to contain the groundwater with the highest detected concentrations of TCE and benzene. The extracted groundwater is conveyed without treatment to the OCWD Desalter Project facility for treatment and discharge to use.

3-B. OCWD Desalter Project, Three On-Station Shallow Extraction Wells, Wellhead Treatment

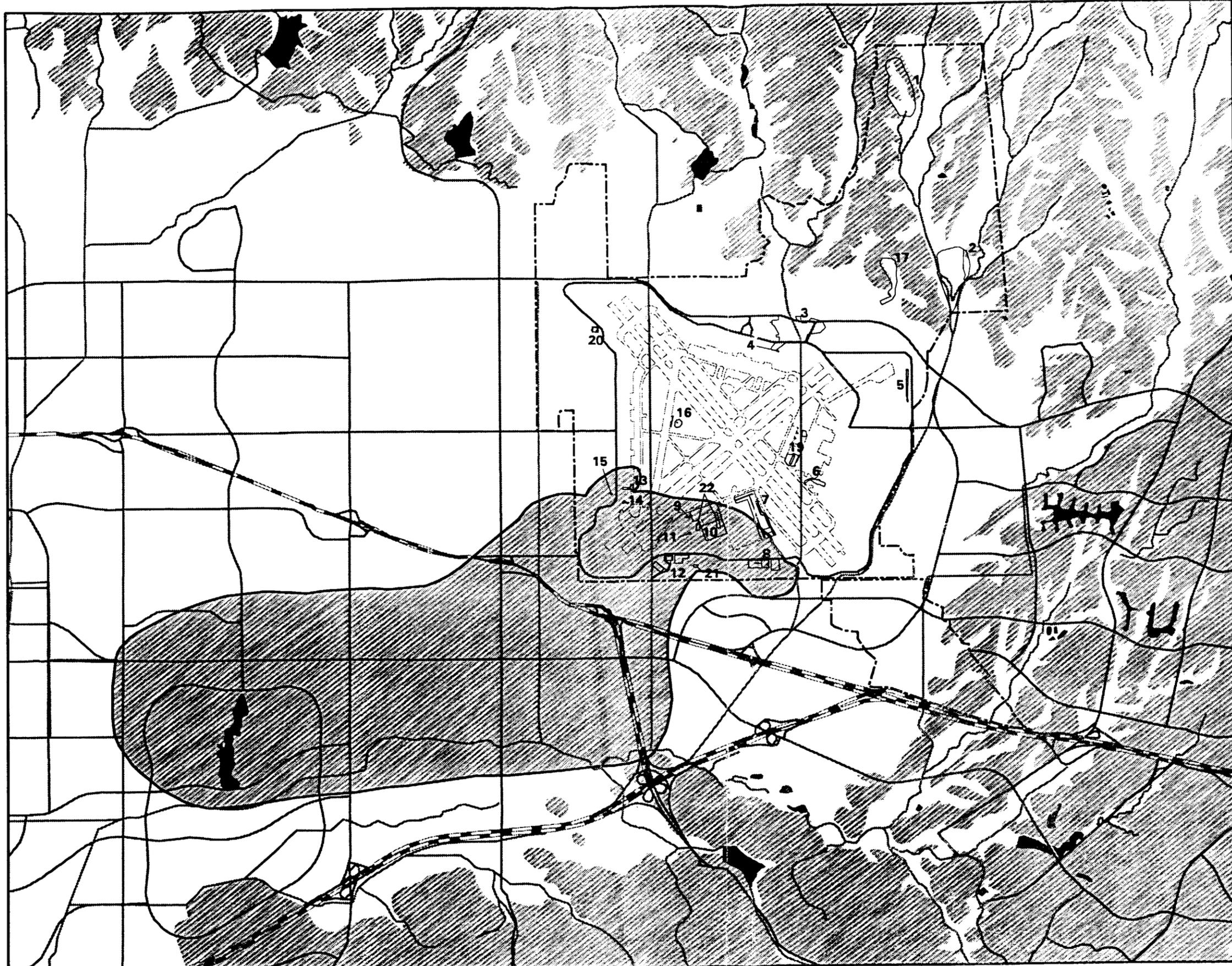
This alternative is the same as Alternative 3-A except that the groundwater extracted on-Station is treated to remove VOCs before conveyance to the Desalter Project facility for further treatment and discharge to use.

4-A OCWD Desalter Project and Seven On-Station Shallow Extraction Wells

The Desalter Project plus seven additional, on-Station, shallow extraction wells to contain the groundwater in the part of the aquifer with the highest detected concentrations of TCE and benzene, with a higher degree of conservatism than Alternative 3. The extracted groundwater is conveyed without treatment to the OCWD Desalter Project facility for treatment and discharge to use.

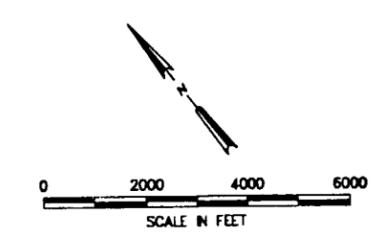
4-B. OCWD Desalter Project, Seven On-Station Shallow Extraction Wells, Wellhead Treatment

This alternative is the same as Alternative 4-A except that the groundwater extracted on-Station is treated to remove VOCs before conveyance to the Desalter Project facility for further treatment and discharge to use.



- FEATURES:**
- BEDROCK
 - LAKE OR RESERVOIR
 - FREEWAY
 - ROAD
 - MCAS EL TORO BOUNDARY
 - WASH OR STREAM
 - ISOCONCENTRATION CONTOUR
 - INFERRED ISOCONCENTRATION CONTOUR

- 1 SITE NUMBER**
- SITE NUMBER AND NAME:**
- 1 EXPLOSIVE ORDNANCE DISPOSAL RANGE
 - 2 MAGAZINE ROAD LANDFILL
 - 3 ORIGINAL LANDFILL
 - 4 FERROCENE SPILL AREA
 - 5 PERIMETER ROAD LANDFILL
 - 6 DROP TANK DRAINAGE AREA 1
 - 7 DROP TANK DRAINAGE AREA 2
 - 8 DRMO STORAGE YARD
 - 9 CRASH CREW PIT No. 1
 - 10 PETROLEUM DISPOSAL AREA
 - 11 TRANSFORMER STORAGE AREA
 - 12 SLUDGE DRYING BEDS
 - 13 OIL CHANGE AREA
 - 14 BATTERY ACID DISPOSAL AREA
 - 15 SUSPENDED FUEL TANKS
 - 16 CRASH CREW PIT No. 2
 - 17 COMMUNICATION STATION LANDFILL
 - 18 ACER SITE
 - 20 HOBBY SHOP
 - 21 BUILDING 320
 - 22 TACTICAL AIR FUEL DISPENSING SYSTEM



**GEOGRAPHIC EXTENT
OF DETECTED VOCs
IN GROUNDWATER
FOR OU-1 INTERIM ROD**

**MCAS EL TORO
OU-1 FS**