

**TITLE:** COMMENTS ON THE INSTALLATION  
ASSESSMENT STUDY OF MCAS EL TORO

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DEPARTMENT OF HEALTH SERVICES

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M600:

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MCAS EL TORO  
SSIC # 5090.3

## DEPARTMENT OF HEALTH SERVICES

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August 5, 1986

Mr. W.L. Hoey  
 United States Marine Corps  
 Marine Corps Air Station  
 El Toro (Santa Ana), CA. 92709-5001

Dear Mr. Hoey:

Upon our review of the May 1986, Installation Assessment study of Marine Corps Air station, El Toro, California, the Department has provided comments and recommendations. A follow-up report must address these comments in order to ensure adequate management of the contaminated sites under state laws and regulations.

Based on information contained in the Initial Assessment document, the Department requires that confirmation studies also be conducted at the following sites: site 6-Drop Tank Drainage Area No.1, site 7-Drop Tank Drainage Area No. 2, site 10-Petroleum Disposal Area, site 12-Sludge Drying Beds, site 13-Oil Change Area, and site 15-Suspended Fuel Tanks.

At all 6 of these sites, which the IAS listed as "sites not recommended for confirmation studies," hazardous substances have been released into the environment. Thus, they pose a potential threat to human health and the environment.

Specific Comments and Recommendations:

SITE 6 - As fuel is considered to be a hazardous waste (especially "1,400 gallons of JP fuel & 300 gallons of waste lubricating oil disposed in the soil"), this site poses a potential threat to ground water. Although the IAS refers to the contamination as a "small quantity," a confirmation study must be conducted to determine the amount of soil contamination and potential threat to groundwater.

SITE 7 - A confirmation study is required at this site to <sup>assess</sup> ~~assess~~ contamination caused by the "one time spill of 2,000 gallons of JP-5 fuel, and the regular practice of waste oil disposal onto the ground.

SITE 10 - Although 2 feet of contaminated soil was removed, in some areas, as part of the process to install a concrete apron and a crash crew barn, the IAS report implies that there may be additional wastes present which were not removed in this process. In addition, the Department has concerns regarding the possibility that the solvents, waste crankcase oil, antifreeze, hydraulics/transmission fluids and motor fuel which was disposed of onto the site may have percolated more than 2 feet down into the soil. Therefore, the Department requires that a confirmation study be conducted.

SITE 12 - In the IA report, the thickness of the volume of sludges at this site has been "assumed," site data is based on "typical concentrations" of heavy metals, and "ballpark" estimates were included in the data as adequate information. Assumptions and "ballpark" estimates do not provide sufficient information to declare whether a site is neither hazardous nor safe. Therefore we require that a confirmation study be conducted to determine accurate measures of the amount of sludges and heavy metals present.

SITE 13 - Of approximately 7,000 gallons of crankcase oil which was disposed of in the soil, how much of the contaminated soil has been removed? We request data concerning the amount of contamination present as well as a method of disposal for the pile of contaminated soil, as mentioned in the IAS report.

SITE 15 - At this site, more than 500 gallons of diesel fuel was spilled onto the ground. Reportedly, the soil is stained for 750 square feet. 500 gallons of fuel spilled in the soil is a substantial amount to cause environmental contamination. Therefore a confirmation study must be conducted.

The Department requires prompt response to the above comments and recommendations in the form of a draft Statement of Work for the Confirmation Study. The Department will review and comment on the draft S.O.W. Comments will be incorporated into the final S.O.W. for execution by your contractor.

If you have any questions regarding the enclosed comments, please contact Scott Simpson at this office.

Sincerely,



Scott Simpson, Project Officer  
Assessment and Mitigation Unit  
Southern California Section  
Toxic Substances Control Division

cc: Robert Cantor (NEESA)  
Jerry Clifford (EPA)