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MCAS EL TORO
SSIC # 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

86 NOV 7 PM 2 16
CALIFORNIA SECTION
TECHNICAL SERVICES
RESEARCH CENTER SER.

NOV 4 1986

In Reply T-4-3
Refer to: Facility No.:
CA6170023208

1.2

Commanding General
Marine Corps Air Station El Toro
El Toro, CA 92709-5001

ATTN: Environmental Office

Dear Sir:

The Environmental Protection Agency (EPA) has completed its review of the Initial Assessment Study of Marine Corps Air Station El Toro, California, May, 1986 (IAS). Based on the information contained in the IAS, EPA has determined that additional characterization is needed at twelve additional sites (Sites 4, 6, 7, 8, 10, 12, 13, 15, the Tactical Air Fuel Dispensing Systems Operations area (TAFDS), Building 626, and at two sites near Building 320) before any decision regarding further action at these sites is made.

As you may know, in the Memorandum of Understanding (MOU) between the Department of Defense (DOD) and EPA for the Implementation of P.L. 96-510, the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, currently expired but under renegotiation, DOD committed to respond to releases or potential releases of hazardous substances, pollutants, and contaminants in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, 40 C.F.R. Part 300 (NCP). Accordingly, the recommendations of the IAS have been reviewed for consistency with the NCP.

The IAS indicates that hazardous substances are known or are suspected to have been released at Sites 4, 6, 7, 8, 10, 12, 13, 15, TAFDS, Building 626 (Hobby Shop), Building 320 (Material Management Group) and at Building 320 (Supply Center Storage), yet the IAS recommends no further action at these sites. These substances may migrate into ground water resources, which are used for both potable and agricultural purposes, or may migrate via surface run-off. Even without migration, these substances and sites may pose a threat to human health or the environment. EPA recommends that, consistent with the NCP, MOU, and relevant EPA guidance, Confirmation Studies be conducted at the twelve sites listed above in addition to the nine sites the IAS recommends for Confirmation Studies. Specific comments on the IAS and the twelve additional sites of concern are enclosed.

TITLE: CORRESPONDENCE REGARDING REVIEW OF INITIAL ASSESSMENT STUDY

AUTHOR: JERE JOHNSON/US EPA

DATE: 11/04/86

CATEGORY: 1.2

In order for EPA to more promptly provide oversight and technical assistance to the investigation and cleanup activities at Marine Corps Air Station El Toro, I would appreciate receiving a schedule of future Installation Restoration Program (IRP) activities. In addition, please send me a copy of the draft Confirmation Study Scope of Work when available so that EPA may review and comment on the proposed activities.

If you do not plan to implement these recommendations during the next phase of IRP activities, please respond in writing. If you have any questions regarding this letter, please contact Nicholas Morgan, Superfund Federal Facilities Coordinator, at (415) 974-8918, or Lewis Mitani at 415/974-7836.

Sincerely,



Jere Johnson
Acting Chief, Federal Response Section
Superfund Programs Branch

Enclosure

cc: ✓ Nestor Acedera, DOHS
Gary Gasperino, NEESA
Ron Rodriguez, RWQCB
Hank Shanks, WESTDIV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

29 OCT 1996

Memorandum

Subject: Review of Installation Assessment Study of Marine Corps Air Station, El Toro, California

From: Lewis Mitani *Lewis Mitani*
Remedial Project Manager, T-4-3

To: Marine Corps Air Station El Toro File

General Comments

Section 6.2.4. page 6-2, POL Storage, Underground did not adequately address underground storage tanks (UST), both active and inactive as well as product and waste storage holding tanks. UST represents a significant source of soil and groundwater contamination and an inventory of the UST on MCAS El Toro should be more complete than the one presented in Appendix C of the report. The size of the tank, construction material, the age of the UST, and type of product or waste the tank held as well as its location should be included in the inventory. Any UST program on base should be noted, including integrity testing, spill control, leak detection systems, base response to leaks and any cleanups.

Not fully addressed in the report is how MCAS El Toro stored, handled or shipped electrical insulating fluids, specifically polychlorinated biphenyls (PCB). MCAS El Toro has been operational since 1943, potentially, older electrical equipment may be still present on base. What kind of electrical insulation is in the electrical equipment (transformers, switches, and oil fuse cutoffs) that is located on MCAS El Toro? Has the older PCB filled electrical equipment been replaced over time? Of the electrical equipment that is or have been present on MCAS El Toro, what type of maintenance (repair, preventative) was conducted on them? Were there any instances of spillage or malfunctions of electrical equipment that lead to spillage or leakage of electrical fluid? Were electrical insulation fluids utilized for dust control on unpaved roads? Where were insulating fluids stored or disposed?

Disagree with the compositing of samples for the sites recommended for confirmation study. A confirmation study should identify unknown compounds present, to what extent they are present and how they are integrated into the environment. Compositing of samples can mask problems by diluting isolated concentrations of hazardous compounds to below detection limits. A sampling program should generate data suitable for subsequent analysis so that informed environmental decisions can be made.

EPA concurs that the following sites should go to confirmation study at MCAS El Toro:

- Site 1 Explosive Ordnance Disposal Range
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- Site 17 Communication Station Landfill

The following are sites of concern and are recommended for confirmation study or further investigation and evaluation:

- Site 4 Ferrocene Spill Area
- Site 6 Drop Tank Drainage Area No. 2
- Site 7 Drop Tank Drainage Area No. 7
- Site 8 DPDO Storage Yard
- Site 10 Petroleum Disposal Area
- Site 12 Sludge Drying Beds
- Site 13 Oil Change Area
- Site 15 Suspended Fuel Tanks
- Unnumbered Site, Hobby Shop (Building 626)
- Unnumbered Site, Material Management Group (Building 320)
- Unnumbered Site, Tactical Air Fuel Dispensing System (TAFDS) Operations Area
- Unnumbered Site, Supply Center Storage (Building 320)

Comments for Sites of Concern

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Site 6 Drop Tank Drainage Area No. 2. The combination of JP-5 fuel washed out and lubrication oils that was reportedly disposed of from 1960 to 1983 could pose a threat to groundwater as well as the accumulation of hazardous components in the soils.

The JP-5 fuel could make the trace and heavy metal components of the lubrication oils more mobile than anticipated. Also the hazardous components of JP-5 fuel could accumulate in soil or migrate to groundwater.

Site 7 Drop Tank Drainage Area No.2. See comments for Drop Tank Drainage Area No. 1.

Site 8 DPDO Storage Yard. The dismissal of the DPDO storage yard appears to be based on the spillage of several gallons of PCB which were excavated. The actual cleanup of the PCB spill area was unsubstantiated by laboratory analysis. In section 5.2.14 the DPDO yard has been utilized at this site from early 1940's to present date. The report states "leaks or spill have reportedly occurred in the storage yard complex from stored containers and mechanical electrical components but there is little or no documentation regarding timing and volume. The greatest potential for environmental pollution may be associated with storage of solvents, paints, thinners and other substances and leakage of PCB containing insulating oils for stored electrical transformers". This site clearly has the potential to present an environmental threat from sources other than the single documented PCB release. Not addressed in this report is whether or not this site is paved, runoff patterns from the site and spill control countermeasures.

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Site 12 Sludge Drying Beds. The use of available data on typical concentrations of heavy metals in municipal sewage sludges to give a "ball park" estimate of metals content that would be expected is to broard an assumption to make a sound environmental judgement.

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Site 15 Suspended Fuel Tanks. Reportedly 500 gallons of diesel fuel spilled to the ground and stained a 750 square foot area. Components of diesel fuel can accumulate to levels that represent an environmental hazard. The assumption of ultraviolet and bio-degradation of diesel fuel is an insufficient reason to dismiss the site. A sound environmental decision should be made based on laboratory data.

Unnumbered Site, Hobby Shop (Building 626). This site is described in Section 5.2.8, page 5-7 of the IAS report. A 600 gallon UST is utilized to store waste oil. The report states "the ground around the tank and leading to the building is saturated with oil. Two square feet of the building, in line to the tank and closest to the ground, are discolored black with the oil that has seeped under the floor". This is a description of an operation that has housekeeping problems. Seepage under the floor may include other substances that are considered hazardous waste. From 1967 to before 1976 the asphalt in the compound was washed down with kerosene. The use of kerosene would make organic compounds, trace and heavy metals mobile, possibly reaching the groundwater. The extent of contamination and the type of waste(s) being generated should be identified so that a proper environmental assessment can be made.

Unnumbered Site, Material Management Group (Building 320). This site was identified in section 5.2.13.1, page 5-10 of the IAS report. The report states "the only wastes of concern produced are the leakage from stored chemical drums, and chemical supplies with expired shelf life. The drums are stored outside of Building 320. In 1964 about 1,000 drums were stored there; now, there are about 100-125 drums. Leaky drums received are returned to the supplier". From 1964 to present date drums containing chemicals appear to have been stored in this one area. Over the 22 years this area was utilized for the storage of drums, a considerable number of drums must have leaked. Not addressed in the report is exactly where outside Building 320 are the drums stored? Is the site paved? Is the site bermed? What is the runoff pattern of the site? Are there unpaved areas where runoff can collect or percolate into the soil? Were solvents ever used to wash down the drums or "clean" the area? What spill control countermeasures has the Material Management Group taken?

Unnumbered Site, Tacticle Air Fuel Dispensing System (TAFDS) Operations Area. This site was identified in section 5.2.13.2 on page 5-11 and in section 5.3.3.1 on page 5-16 of the IAS report. The use of bladder tanks for the storage of fuel has resulted in the spillage or leakage during operations. Not addressed in the report is the area in which the bladder tanks are stored, is the area paved? Is the area bermed? What is the runoff pattern of the area? What spill control countermeasures

has TAFDS taken? During the cleanup of one of the spills that occurred two or three years ago (page 5-11) the dirt under the fuel bladder was hauled away by TAFDS. Is this a standard operating procedure? Were soil samples collected to determine the adequacy of cleanup? Where were the contaminated soils disposed?

Unnumbered Site, Supply Center Storage. This site was identified in section 6.2.6 on page 6-3 of the IAS report. Is this the same site described in section 5.2.13.1 on page 5-10 of the IAS report? See comments for unnumbered Site, Material Management Group Building (Building 320).

Preliminary Assessment Recommendation

MCAS El Toro ERRIS file should remain active and the MCAS El Toro should be notified of EPA's determination that confirmation studies are recommended to ensure consistency with the NCP. National Priorities List scoring should be initiated as soon as sufficient confirmation study data is available.



NICHOLAS MORGAN
Environmental Engineer

U. S. Environmental Protection Agency
Toxics & Waste Management Division T-4-3
215 Fremont Street
San Francisco, CA 94105

(415) 974-8918
(415) 974-8603

ROUTING AND TRANSMITTAL

To: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
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2. RUDOLPH		
3.		
4.		
5.		

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As Requested	For Correction	Prepare Reply
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Coordination	Justify	

REMARKS

Sorry for the errors on the CC's.
Please call me on all correspondence
relating to Flexible Agency Toxic
Waste Investigations + Cleanups -

THANKS -
Nick Morgan
EPA Region 9
Superfund Federal Facilities Unit

DO NOT use this form as a RECORD of approvals, concurrence, disposal, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No. - Bldg.
	Phone No.

ENVIRONMENTAL PROTECTION AGENCY

REGION IX

5 Fremont Street
San Francisco, Ca. 94105

FOOD	DATE
	NOV 10 1985
GJT	11/10
RCH	
KVB	11/10
MJA	11/10

In Reply T-4-3
Refer to: Facility No.:
CA6170023208

you provide oversight and
remediation and cleanup activities
I would appreciate receiving
the Remediation Program (IRP)
I would like a copy of the draft
available so that EPA may
conduct these activities.

these recommendations during
the time you respond in writing. If you
prefer, please contact Nicholas
Johnson, Coordinator, at (415) 974-8918,

Sincerely,

Nicholas Johnson
Nicholas Johnson

Chief, Federal Response Section
and Programs Branch

The Environmental Protection Agency (EPA) has completed its
Final Remedial Action Study of Marine Corps Air Station
(IAS). Based on the information
gathered, it has determined that additional character-
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Fuel Dispensing Systems Operations area
and two sites near Building 320) before
remedial action at these sites is made.

Memorandum of Understanding (MOU)
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implementation of the Comprehensive Environmental
Response Act of 1980, currently expired
which committed to respond to releases or
discharges of hazardous substances, pollutants, and
toxics consistent with the National Oil and
Hazardous Waste Contingency Plan, 40 C.F.R. Part
300. Recommendations of the IAS have been
incorporated into the NCP.

Hazardous substances are known or are
suspected to be present at Sites 4, 6, 7, 8, 10, 12, 13, 15,
and 16, Building 320 (Material Management
Supply Center Storage), yet the IAS
did not investigate these sites. These substances may
be sources, which are used for both potable
water and may migrate via surface run-off. Even
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NICHOLAS MORGAN
Environmental Engineer

U. S. Environmental Protection Agency
Toxics & Waste Management Division *4-3*
215 Fremont Street
San Francisco, CA 94105

(415) 974-8918
(415) 974-8803

Review

Approved	
As Requested	
Comments	
Justification	

CALIFORNIA STATE ENVIRONMENTAL

INVESTIGATION

TO

STATE INVESTIGATION

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

RECORD	DATE
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KVB	11/10
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NOV 4 1986

In Reply T-4-3
 Refer to: Facility No.:
 CA6170023208

Commanding General
Marine Corps Air Station El Toro
El Toro, CA 92709-5001

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Jere Johnson
Acting Chief, Federal Response Section
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Enclosure

cc: Nestor Acedera, DOHS
Gary Gasperino, NEESA
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29 OCT 1986

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Preliminary Assessment Recommendation

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