

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4

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MCAS EL TORO
SSIC # 5090.3

December 20, 1994

Mr. Wayne D. Lee
Assistant Chief of Staff
Environmental Safety
U.S. Marine Corps Air Station - El Toro
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Lee:

REVIEW COMMENTS ON THE HEALTH AND SAFETY PLAN (HASP) PORTION OF THE
PHASE II REMEDIAL INVESTIGATION WORKPLAN

The Department of Toxic Substances Control (Department) has completed its review of the HASP. Basically, the HASP as provided is incomplete. The Department's general and specific comments are enclosed.

We look forward to working with you on these and other issues. Feel free to contact me at (310) 590-4919.

Sincerely,

Juan M. Jimenez
for

Juan M. Jimenez
Remedial Project Manager
Region 4, Base Closure Unit
Office of Military Facilities

Enclosures

cc: Ms. Bonnie Arthur
U. S. Environmental Protection Agency, Region IX
Hazardous Waste Management Division, H-9-2
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San Francisco, California 94105-3901

WLEEJ



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bcc: Alice Gimeno
Office of Military Facilities
Region 4

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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**M E M O R A N D U M**

TO: Juan Jimenez
Hazardous Substances Scientist
Office of Military Facilities, Region 4
245 West Broadway, Suite 425
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FROM: Jerry D. Earley, M.A., REHS *Jerry D. Earley*
Associate Industrial Hygienist, Region 3
Office of Scientific Affairs (OSA)
Industrial Hygiene Section (IHS)

DATE: December 13, 1994

SUBJECT: EL TORO MARINE CORPS AIR STATION (MCAS)
PCA Code: 14740 Site Number: 400055 WP: 45
MPC: 00 OC: 02

BACKGROUND

The Office of Military Facilities in Region 4 requested OSA-IHS review of the Health and Safety Plan (HASP) for the Remedial Investigation activities to be conducted at MCAS in Tustin, California. MCAS is located approximately 40 miles south of Downtown Los Angeles near the center of Orange County.

MCAS was originally commissioned in the Fall of 1942 as a Navy blimp base. MCAS is currently used as a base for the Marine Corps medium and heavy helicopter training and operations.

The areas of concern during this phase of the investigation are as follows:

- Site 2 - Magazine Road Landfill
- Site 3 - Original Landfill
- Site 4 - Ferrocene Spill Area
- Site 5 - Perimeter Road Landfill
- Site 6 - Drop Tank Drainage Area
- Site 7 - Drop Tank Drainage Area No. 2
- Site 8 - DRMO Storage Yard
- Site 9 - Crash Crew Pit No. 1
- Site 10 - Petroleum Disposal Area
- Site 11 - Transformer Storage Area
- Site 12 - Sludge Drying Beds
- Site 13 - Oil Change Area

- Site 14 - Battery Acid Disposal Area
- Site 15 - Suspended Fuel Tanks Area
- Site 16 - Crash Crew Pit No. 2
- Site 17 - Communication Station Landfill
- Site 19 - Aircraft Expeditionary Refueling Site
- Site 20 - Hobby Shop
- Site 21 - Materials Management Group
- Site 22 - Tactical Air Fuel Dispensing System
- Site 24 - Potential VOC Source Area
- Site 25 - Major Drainage

The RI will evaluate the extent of soil and groundwater contamination resulting from site operations. The RI will consist of the following activities:

- non-intrusive geophysical survey;
- soil gas survey;
- mud rotary boring;
- groundwater sample collection;
- soil sample collection;
- monitoring well installation;
- shallow hand auger boring and sampling; and,
- hollow-stem auger and air rotary boring.

The chemicals of concern are organic compounds, halogenated hydrocarbons, metallic compounds, minerals, inorganic salts, pesticides, and radioactive materials. Volatile aromatic and aliphatic organic compounds, petroleum hydrocarbons, ketone and ester organic compounds. The halogenated hydrocarbons include chlorinated solvents, vinyl chloride, and polychlorinated biphenyls. Metals of concern are heavy metals such as arsenic, cadmium and other metals such as selenium. The minerals involved are mainly asbestos and silica. It should be noted site 1, which is not addressed in this addendum, is expected to contain the radioactive materials uranium and radium.

DOCUMENT REVIEWED

OSA-IHS reviewed "Draft Health and Safety Plan for Phase II RI/FS" and the previously approved "Health and Safety Plan" dated November 9, 1993. The Phase II HASP was prepared by Bechtel National, Inc., for the Southwest Division Naval Facilities Engineering Command. It was dated November 1994 and received by OSA on December 1, 1994. The Phase II HASP is an addendum to the November 9, 1993 approved HASP.

GENERAL COMMENTS

DTSC has reviewed the HASP for compliance with Title 8, California Code of Regulations (T8 CCR), section 5192: "Health and Safety for Hazardous Waste Operations and Emergency Response" as well as other appropriate State and Federal Occupational Health and Safety Regulations. Please note that in addition to the requirements of this section, the employer is responsible for the implementation of an effective Illness and Injury Prevention program which is required by the T8 CCR, sections 1509 and 3203. The requirements of those sections have not been included in this review.

An industrial hygienist from the OSA-IHS may perform a field audit in order to confirm the implementation of the provisions and specifications presented in the HASP.

DTSC is unable to foresee all the health and safety hazards in the work-place by the review of the submitted plan. Continuous surveillance of the work-site and creation of an effective health and safety program by the employer will reduce work place injuries and reduce liability.

The review of this HASP is not a guarantee that it will be properly and safely implemented. HASP implementation is the employer's responsibility. Approval is limited to concurrence that all the required elements of a safety plan are present.

SPECIFIC COMMENTS

On page 5-1 item 5.2.1 the HASP states that heat stress is a potential problem and monitoring will be conducted. In table 5-1 the worker pulse rate is the only type of monitoring indicated for heat stress. According to the "NIOSH/OSHA/USCG/EPA Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities", as well as other references, oral temperature and possibly body water loss monitoring is recommended. The plan should be revised to include at least body temperature monitoring for the assessment of heat stress.

Juan Jimenez
December 13, 1994
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CONCLUSIONS

The submitted HASP does not contain all of the elements specified in T8 CCR, section 5192. Areas identified as deficient should be corrected or clarified and resubmitted for further review. Recommendations are included above for review and consideration. Thank you for the opportunity to review the MCAS HASP.

PEER REVIEW BY:



Nannette N. Oseas, M.S., CIH
Senior Industrial Hygienist
Office of Scientific Affairs

cc: Site File
OSA