UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

December 9, 1991

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

Subject: EPA Review of Draft RCRA Facility Assessment Planning Memorandum
El Toro MCAS

Dear Mr. Piszkin:

This letter transmits our comments on the Draft RCRA Facility Assessment Planning Memorandum for El Toro Marine Corps Air Station dated 30 October 1991.

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,

Marla Mezquite for J.A.

Julie Anderson-Rubin, Chief
Federal Enforcement Section II

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

REVIEW OF EL TORO MARINE CORPS AIR STATION
RFA PLANNING MEMORANDUM

GENERAL COMMENTS

1. Tables

The tables which summarize the proposed exploratory soil borings are clear.

2. Table of Contents

The Table of Contents of the planning memorandum is very confusing. The Site Health and Safety Plan (pages B.i-B.145) is not listed in the Table of Contents in Attachment D. Section D1016, safety requirements, is misaligned in Attachment D. Figures 1-4 are not listed in the contents of Attachment D. Analysis of dioxins, TPH, and total fuel hydrocarbons should appear in part 3 of the contents of Attachment E instead of parameters.

3. Electromagnetic (EM) Survey Data

The interpretation of conductivity results is inconsistent. For example, the same pattern of conductivities and in-phase data is shown on Attachments A, B, and C, which were considered anomalies in one line but were not considered anomalies in another line. More detailed inconsistencies of the interpretations are further discussed in specific comment No. 5.

4. Planning

MCAS-El Toro did not plan well prior to conducting the EM survey. Metal objects on the surface such as aircraft and tanker trucks will interfere with the EM investigations of underground storage tanks and pipes. Many unsuccessful EM surveys could have been eliminated, if removal of surface metal objects had occurred before the EM survey.

5. Quality Control

The document reproduction had poor quality control. Examples are: incorrectly bound in Attachments C and D; repetition of page 3-2 in Attachment F.

6. Geophysical Surveys

Fifteen geophysical survey sites were performed unsuccessfully using the EM method. Does MCAS-El Toro plan to resurvey the sites using alternative methods such as Ground Penetration radar, etc.?

SPECIFIC COMMENTS

1. Attachment A, Page 1-1, 2nd Paragraph

Unsuccessful geophysical surveying was performed at 15 sites. Does El Toro MCAS plan to conduct the geophysical survey again for these sites?

2. Page 1-3, Table 1-1

Is Table 1-1 the summary of the 41 "recommended" SWMUs and AOCs for geophysical surveys or the "conducted" geophysical surveys? Table 1 in Attachment A is the recommended 25 SWMUs and AOCs for geophysical surveys. Table 1-1 should be the conducted geophysical surveys for the 41 SWMUs and AOCs.

3. Page 1-3, Table 1-1

The symbol * indicates unsuccessfully surveyed geophysical sites. There are 12 unsuccessful sites shown in Table 1-1. Where are the other three unsuccessfully surveyed geophysical sites?

4. Page 2-3, Figure 2-1

The letter "E" should be added into Grid East after 1000.

5. Page 2-3, Figure 2-1, and Attachment A

There are some inconsistencies for interpreting the conductivity and in phase data. What is the criteria for interpreting EM conductivity results shown in Figure 2-1 from raw data shown in Attachments A, B and C? For example, in Attachment A, the signals at Line 830, 1145 feet and 1150 feet north, were not considered as anomalies, and signals at Line 840, 1185 feet and 1190 feet north, were considered as anomalies and plotted in Figure 2-1.

6. Page 2-5, 1st Paragraph

In areas where aboveground metal is close to the underground pips and tanks, it is difficult to distinguish the aircraft (F-4s and DC-3s) and buried metals. Why were the aircraft not removed during the EM survey at Tank Farm No. 1? Does El Toro MCAS plan to conduct another survey to identify the tanks and pipelines in the proximity of aircraft?

7. Page 2-6, 2nd Paragraph

After conducting the EM survey at Tank Farm No. 1, what is the recommendation if further action will be undertaken at the site?

8. Page 2-11, 1st Paragraph

Many metal objects, such as tanker trucks, were in the field that caused the interference during the EM survey. What planning did El Toro MCAS do before conducting the geophysical survey?

9. Page 2-11, 3rd Paragraph

Underground Storage Tank (UST) 195 is a SWMU/AOC at Tank Farm No. 3. However, no description regarding tank size and waste storage found in the tank is included in the text. Please add this information into the text.

10. Page 2-16, 3rd Paragraph

The report entitled ***USMC MCAS EL TORO Underground Storage Tank Management Plan (Draft)*** by EG&G Idaho Inc. (November 1990) indicated that Tank Nos. 188, 190, 192, 193, 194, and 195 were removed in 1970. However, this EM study confirmed that these tanks were still located in the field. This is a very important finding. Does El Toro MCAS plan to revise the UST management plan?

11. Page 2-18, 2nd Paragraph

Three boring locations were planned in the field after the EM survey. What are the depths of these planned boreholes? What is the criteria for selecting boring numbers and locations?

12. Page 2-19, 2nd Paragraph

Table 1-1 listed Tank T-C (SWMU/AOC #20) located at Building 414. However, page 2-19 of the text located Tank T-C at Tank Farm No. 101. Which is the correct location?

13. Page 2-19, 3rd Paragraph

How deep will the three sample borings be? It is unclear whether these three sample locations were recommended for the Sampling Visit (SV) or the three borings had been sampled already.

14. Page 2-20, 1st Paragraph

It is not clear that two five-foot borings were sampled or recommended?

15. Page 2-21, 2nd Paragraph

How deep will the boring be?

16. Page 2-22, Last Paragraph

The Fuel Bladder is SWMU/AOC #9. SWMU/AOC #96 is incorrect.

17. Pages 2-1 through 2-25

There are four SWMUs/AOCs (26, 242, 263, and 269) that were not studied in this report. Are these SWMUs/AOCs unsuccessfully surveyed geophysical sites? If the answer is positive, the correct number of unsuccessfully surveyed sites will be 16.

18. Attachment C

The memorandum was incorrectly bound. The current second page should come first, followed by the actual second page.

19. Attachment D

This RFP letter is misprinted and incorrectly bound. The second and third pages should be switched.

20. Attachment D, Request for Proposal, Page 1, Contents

Where is the table of contents of the Site Health and Safety Plan? If the Site Health and Safety Plan is listed in part 3 of Appendix C, then all the pages of the plan should be numbered from C-i through C-145. The current Table of Contents for the Site Health and Safety Plan were improperly numbered.

21. Attachment D, Request for Proposal, Page 1, Contents

Section D1016 of Part 4 of Attachment D, Safety Requirements, is misaligned.

22. Attachment D, Request for Proposal, Page 1, Contents

Figures 1-4 are not listed in Part 5, Drawings.

23. Attachment D, Page B-77, 1st Paragraph, Health and Safety Plan

The descriptions of 156 specific Sampling Visit sites were mentioned in the Health and Safety Plan. However, 157 SWMUs/AOCs recommended for a Sampling Visit was mentioned in the PR/VSI. Which is the correct number of sites?

24. Attachment E, Page 7, Notes

The mud rotary drilling method was listed in the notes. But the drilling method in Table 1 addressed the Hollow-Stem Auger Method will be performed for most proposed drill holes. Will the Mud Rotary Method be applied for the drilling? If the answer is negative, please remove Mud Rotary Method from your note.

25. Attachment F, Page 1-3, 4th Paragraph

The total drilling footage of vertical soil borings and angle soil borings are different from the listing in Table 2-1. According to the table, total drilling footage is 5,970 feet. According to the text, the total drilling footage is 6,700 feet. Which is correct?

26. Attachment F, Page 2-1, 2nd Paragraph

Will the Mud Rotary Drilling Method be performed for drilling? If the answer is positive, then the drilling fluid (mud) will be generated from RFA investigation.

27. Attachment F, Page 3-1

Title 23, California Code of Regulation (CCR), may be added into regulations reviewed because it was discussed in Section 3.2.

28. Attachment F, Page 3-2

There is a redundancy in pagination of the text. There are two pages numbered "3-2."

29. Attachment F, Page 3-2, Paragraph 1

This section discusses the definition of listed waste, the waste which does not satisfy the nonhazardous waste management, and the hazardous characteristic testing. It does not discuss what to do with listed waste. This section may be expanded to include if the analytical data of listed waste meeting the appropriate treatment standards then how to dispose of it. If the listed waste does not met the treatment standards, then the storage requirements will be applied. What kind of treatment method will be applied for waste treatment before disposal?

The examples in Section 3.2 already discusses the treatment cases. We prefer adding this discussion into Section 3.1 to have a complete concept.

30. Attachment F, Page 3-2, 2nd Paragraph

The Appendix "X(9b)" lists 66 common waste names. "X(b)" is a typographical error, and 71 listed in the text is incorrect.

31. Attachment F, Page 3-2, 2nd Paragraph

The extremely hazardous waste criteria was addressed in 22 CCR 66261.107 and 66261.110, not 22 CCR 66261.107 to 66261.113.

32. Attachment F, Table 4-1

There is no page number for Table 4-1.

33. Attachment F, Table 6-1

There is no page number for Table 6-1.