

M E M O R A N D U M



M60050.001781
 MCAS EL TORO
 SSIC # 5090.3

TO: Bonnie Arthur/EPA
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COPIES: Joseph Joyce/El Toro
 Andy Piszkin/SWDIV

FROM: CH2M HILL Project Team

DATE: March 24, 1995

SUBJECT: Revised Responses to U.S. EPA Review Comments on Draft CERFA and
 EBS Reports for MCAS El Toro

PROJECT: SCE70257.FT.07

Please find attached a revised version of the response to EPA comments on the Draft CERFA and EBS Reports for MCAS El Toro. Based on conference calls held on 23 March 1995, responses to EPA comments have been revised as follows:

<u>Comment</u>	<u>Response Revision</u>
R-4	Second sentence of response deleted
R-7	Paragraph added to clarify categorization of aircraft refueling areas
R-9	Second sentence of response deleted
R-20	Response revised to indicate the basis of categorization of buildings containing PCB items

Comments Received from U.S. Environmental Protection Agency:

General Comments:

C-1 Use of Term "Uncontaminated": In the Report's introduction, and throughout the document, the Navy uses the word "uncontaminated" in a manner which is inconsistent with CERCLA Section 120 (h)(4) (CERFA). For example, on p. ES-3, the statement is made that "[i]n general, the Navy considers Area Types 1, ... 2, 3, and 4 as being uncontaminated property." This statement is incorrect, in that Section 120(h)(4) defines "uncontaminated" specifically as "real property on which no hazardous substances and no petroleum products or their derivatives were stored for one year or more, known to have been released, or disposed of." Thus, "uncontaminated" should be used to refer only to property in BRAC Category 1. Because the Navy has written the EBS specifically to comply with CERCLA Section 120(h)(4), it is critical that the document use the term "uncontaminated" as Section 120(h)(4) defines it.

If the Navy intends also to provide information about property in categories 2, 3, and 4 as property which may be available for transfer in the near future, you could discuss these areas such that "types 2, 3, and 4 are areas where contamination is not expected to impede property transfer." As the term "uncontaminated" is used inaccurately throughout the text, a reference to this general comment will appear throughout the specific comments included below.

R-1 The Navy agrees with EPA's comment. The CERFA and EBS Reports will be revised to only request Area Type 1 land for CERFA-eligibility.

Sections of the Draft CERFA and EBS Reports related to Area Types 2, 3, and 4 property being proposed for CERFA-eligibility will be removed. However, in the EBS Report, the Navy believes that it is important to highlight Area Types 2, 3, and 4 property identified at the Station since these areas, although not CERFA-eligible, do not pose an environmental concern and are not expected to impede property transfer.

C-2 Use of Term "Locations of Concern": "Locations of Concern" is not specifically defined in the document. Please provide a definition and explanation of how the various subsets of sites (locations of concern, areas of concern, IRP sites, SWMUs, uncontaminated parcels) relate to one another. For example, does "locations of concern" describe the entire set of all issues at El Toro, with Areas of Concern and IRP sites as subsets within this set? Please be specific about whether any areas identified as Locations of Concern are also identified as Category 1 parcels and provide any information in support of considering these parcels uncontaminated.

R-2 The term "LOC" will be explained in more detail in the Final EBS Report.

C-3 Categorization of PCB transformers: On Pages 3-8 through 3-10, it appears that all areas where PCB transformers are located or were located are considered in the

report to be Locations of Concern. For purposes of EPA's concurrence with category 1 uncontaminated property, it is important to distinguish areas in which PCB transformers are in use from areas where they are being, or were, stored. Areas where PCB transformers were stored, such as SWMU/AOC 7 and IRP Site 11 (Transformer Storage Area), do not qualify as uncontaminated property. Areas where PCB transformers are intact, not leaking, and in use in an electrical system; or areas where PCB transformers were intact and in use up to the time when they were removed; can be considered category 1. Classifying property under this definition will potentially identify more uncontaminated property than the current draft EBS identifies. The same definition should also be applied to characterize "non-transformer PCB items" and "PCB light fixtures": areas where these PCB-containing equipment are intact, not leaking, and in use; or areas where PCB-containing equipment were intact and in use up to the time when they were removed; can be considered Category 1.

- R-3 The Navy agrees with EPA's position that PCB transformers with no evidence of leakage should be designated as Area Type 1. The Final EBS Report will reflect this revised categorization of PCB transformer locations.**

In addition, buildings with PCB items (e.g., light ballasts, switches, etc.), are not considered LOCs. These buildings will be designated as Area Type 1 and are considered CERFA-eligible.

- C-4 Asbestos:** The Report places asbestos-containing materials under Locations of Concern. For the purpose of identifying uncontaminated property, it is not necessary to rule out areas with asbestos as long as the asbestos is in place within a building and has not been released into the environment. The Navy's disclosure of asbestos-containing materials in site structures is appropriate. However, designating them as locations of concern implies that some further action may be conducted. It would be helpful if the term Locations of Concern were defined more specifically, and if a statement were included which explained how the presence of asbestos did or did not affect property categorization.

- R-4 The EBS Report will be revised to state that buildings with asbestos-containing materials are not designated as LOCs. The presence of asbestos and/or lead-based paint in buildings will be disclosed to potential buyers prior to transfer.**

- C-5 Mapping of groundwater contamination:** EPA has some concerns regarding the representation of groundwater contamination on the maps.

- a) The data used to represent plume boundaries is based on October 1993 data. It is essential that the maps reflect current knowledge about the status of groundwater contamination.
- b) The statement is made that the map on Figure 3-2 "shows location and extent of plumes, which are contoured to appropriate MCLs." Since the maps need to distinguish uncontaminated from contaminated areas, and

because MCLs exceed concentrations which show the evidence of a release into the environment, it is necessary for the maps to designate contaminated groundwater by indicating the non-detect boundary line.

- c) It is our understanding from our January 30 conference call that a plume resulting from a leaking UST located in the central airfield area has not been included in the plume maps for this EBS. Please depict this plume in your revised maps.

All of these concerns can be addressed by the use of groundwater modeling, or other means to approximate contaminant fate and transport, to represent affected areas.

R-5 The following groundwater plume contours and buffer zone criterion will be used in the Final EBS Report based on discussions at the 06 March meeting and an EPA memorandum dated 13 March 1995:

- **Groundwater contamination plumes identified at the Station will be drawn to the contour line representing the non-detect boundary. For each plume, a composite of round 1 (September 1992 - February 1993) and round 2 (June - December 1993) groundwater monitoring results will be provided to present a conservative (or largest) size for each plume. These monitoring events provide the most recent available groundwater information for MCAS El Toro.**
- **A 100-foot buffer zone will be applied to the entire plume boundary (i.e., non-detect contour).**

The comment regarding the groundwater contamination resulting from the tank leak in the central airfield area appears to refer to the release from Tank 398. It should be noted that this hydrocarbon plume was included in the Draft EBS Report.

C-6 Use of 100-foot buffer zones: Absent some specific rationale, buffer zones may not be needed around all locations of concern. Several types of these locations of concern appear to be well-contained and will not require a buffer. Former PCB storage areas which do not indicate release, and non-leaking USTs and ASTs are examples of Locations of Concern which do not appear to require a buffer zone because contaminant migration is highly unlikely. Areas where there is no threat of release do not appear to need a buffer zone. Removing the buffer zones where they are not needed will result in the identification of additional uncontaminated property.

R-6 The BCT for MCAS El Toro has had numerous discussions of buffer zones during March 1995. The BCT has ultimately agreed on the following buffer zones for the Final EBS Report:

LOC Type	Buffer Zone Distance	Comments
IRP Sites	100 feet	Agreed upon by BCT.
Groundwater Contamination Plumes	100 feet	Agreed upon by BCT.
USTs	50 feet	Agreed upon by BCT to account for tank and piping location uncertainties, and contaminant migration.
ASTs	50 feet	See comment for USTs.
OWSs	50 feet	See comment for USTs.
Less than 90-day accumulation areas	50 feet	Apply to account for potential contaminant migration.
Aerial Photograph Features	50 feet	Agreed upon by BCT.
Main Fuel Line	50 feet	Agreed upon by BCT.
RFA SWMUs/AOCs	50 feet	Apply to account for SWMU/AOC size and potential contaminant migration.
PCB Transformer Locations	0 feet	Considered Area Type 1 if no release occurred. For two locations with known releases, no buffer zone was applied because one is located within a building (2nd floor) and one was investigated in the RFA (i.e., levels and extent have been characterized).
LOCs identified from interviews	0 feet	The extent of these LOCs was very conservatively mapped to account for the uncertain locations provided by the interviewees. Therefore, no buffer zone is recommended.
Ordnance Storage Bunkers	0 feet	Agreed upon by BCT.
Pesticide storage areas in agricultural areas	0 feet	Agreed upon by BCT.
Airfield Area	0 feet	No buffer for Area Type 7 portion of airfield area (i.e., area covered by original runways).

C-7 Categorization of Airfield Operations Area (Runways, Taxiways, and Adjacent Land): Categorizing much of the airfield as category 7 based on potential releases seems unnecessarily conservative in the absence of more specific information about such releases. EPA's April 19, 1994 guidance memorandum entitled "Military Base Closures: Guidance on EPA Concurrence in the Identification of Uncontaminated Parcels under CERCLA Section 120(h)(4)" states that evidence of incidental releases of petroleum products on roadways and parking lots would still allow EPA to concur that such property is uncontaminated unless there were more specific reasons to consider these areas contaminated. On other bases, EPA has concurred with the identification as uncontaminated parcels where petroleum products or their derivatives may have been released or disposed of, as evidenced by stains on paved areas. EPA concurred that these parcels can be considered uncontaminated for purposes of CERFA because the information contained in the EBS did not indicate that residual levels of petroleum products or their derivatives on these parcels present a threat to human health or the environment. EPA recommends that additional property on the runway area be considered for category 1 eligibility of those areas where minimal staining of pavement is the only factor for which property is currently disqualified.

In nominating airfield property for possible concurrence, the Navy should briefly discuss the sampling results which were obtained from refueling areas adjacent to the runways and taxiways.

R-7 Based on the 06 March meeting, the airfield will be classified as follows:

- The original paved runways from the 1940s will be categorized as Area Type 1 and can be considered for CERFA eligibility.
- The current unpaved areas may have received application of waste oil for dust control and cannot be considered as Area Type 1. The new (post-1940) runway extensions may possibly reside over previously unpaved areas that received oil application, and also cannot be considered as Area Type 1. Both the current unpaved areas and the new portions of runway will be categorized as Area Type 7 at this time.

Regarding refueling areas, a total of six aircraft refueling areas exist at the Station. Four of the refueling areas are located in the northeast quadrant of the Station near the control tower and two are located in the southeast quadrant of the Station. Fuel is directly supplied to the refuelers through the main JP-5 pipelines at the Station, which are categorized as Area Type 7. The refueling areas are encompassed by the 50-foot buffer zone applied to the main fuel lines and, therefore, are also considered Area Type 7. In addition, the six refueling areas are located on the new extension portions of the airfield (i.e., portions of the airfield constructed after the 1940s), which are categorized as Area Type 7. For these reasons (i.e., located within buffer zone

of main fuel lines and located on the new extension portion of the airfield), the refuelers will require further evaluation.

C-8 Criteria for CERFA-eligible property: The draft EBS includes criteria for the selection of uncontaminated property which is not based on CERFA. This criteria is discussed on p. 5-1 of the draft EBS, and affects the way uncontaminated parcels are mapped and identified throughout the document. The Navy identifies such parcels at El Toro as areas which are "at least 3 acres or larger, accessible, and believed to offer a reasonable opportunity for early transfer." All three of these criteria go beyond the law itself to place extra criteria on the identification of property, which might be needlessly restrictive. EPA encourages the Navy to place as much eligible property in Category 1 as possible, even if it cannot be immediately transferred, for the reason that the Navy and the BCT will not have to re-evaluate these Category 1 areas later when it comes time for them to be transferred as part of a larger parcel. In requesting that some of these small areas be identified for concurrence as uncontaminated parcels, EPA recognizes that enlarged details of some areas of the maps may have to be prepared, or that more specific descriptive language may need to be used to specifically identify the parcels.

R-8 The Navy will request concurrence on all land at the Station that is Area Type 1, with no boundaries or restrictions. This will maximize the acreage of land requested for CERFA eligibility.

At the 06 March meeting, the BCT agreed that placement of boundaries to delineate useable parcels is a good idea for the eventual transfer of Station property. The BCT believed that a map showing potential parcel boundaries based on some constraints of minimum parcel size was a useful presentational tool and suggested that this map be considered for inclusion into the Final EBS Report as a supplemental figure.

C-9 Pesticides: Information about elevated levels of pesticides was not included in the report itself, but was made available in a memorandum provided by the Navy to regulatory agencies on January 10, 1995. The available information indicates levels of pesticides found in certain areas, but does not specifically state how the Navy will characterize parcels containing elevated levels of pesticides. EPA is unable to concur on property containing pesticides which register above public health protective cleanup levels associated with residential use. EPA, the State, and the Navy need to discuss the specific location of the elevated levels of pesticides so that the specific areas of concern are identified, and that parcel boundaries might be redrawn if uncontaminated areas can be legitimately separated from contaminated areas.

R-9 The confirmation sampling results will be included in the Final EBS Report.

C-10 Records Search: CERCLA Section 120(h)(4)(i) through (vii) provides explicit requirements regarding the types of documentation to be reviewed for

identification of uncontaminated property. The EBS lacks specific references to such documentation, although it states that the review of records performed for the BCP was comprehensive. Since that Navy states that its search was comprehensive, please make the affirmative statement that the Navy has completed the comprehensive document search required by the law, and provide the list of documents searched (either by providing that excerpt from the BCP or providing some other list).

R-10 The report will be revised to clarify that the information review requirements specified in CERCLA Section 120(h)(4)(i) through (vii) have been completed for the MCAS El Toro EBS.

Specific Comments

C-11 P. ES-3: Please amend the reference to "uncontaminated" in the table, per General Comment #1.

R-11 The table will be revised to change the reference to "uncontaminated."

C-12 P. ES-4: Please revise the text for the "Horse Stables Area" to include the sampling completed in December 1994.

R-12 The text will be revised to indicate that confirmation sampling was performed at this area.

C-13 ES-5: The Navy characterizes "runways and adjacent land" as category 7, but then states that "it is possible that additional investigation will be required before these areas can be considered to be uncontaminated." This statement is ambiguous because property in category 7 by definition requires further investigation, whether by sampling, documentation, visual inspection and other techniques. See also General Comment #7.

R-13 As agreed upon by the BCT, the airfield operation will be assessed as described in the response to C-7.

C-14 P. ES-5: The Navy characterizes groundwater plumes as category 7. Since it has been established that groundwater contamination exists and that it requires remediation, these areas should be placed in category 5 or 6.

R-14 The text on page ES-5 incorrectly stated the category as Area Type 7. In Section 4 of the report, the groundwater contamination plumes were categorized as Area Type 6. Page ES-5 will be revised to correctly state the category as Area Type 6.

C-15 ES-6: Title search requires completion before CERFA concurrence can be obtained. See General Comment #10.

- R-15 A chain-of-title search was completed for MCAS El Toro in February 1995. The chain-of-title search did not result in the identification of any new locations of potential environmental concern. The results of the chain-of-title search will be included in the Final EBS Report.**
- C-16 P. 3-4: Please update, as the soil gas survey was completed and results are available.
- R-16 The text will be revised to indicate that the soil gas survey has been completed. Based on the results of the soil gas survey, Site 24 boundaries have not been changed.**
- C-17 P. 3-6; Text states that the final RFA Report was submitted on 07/16/93. This section should be updated.
- R-17 The text will be revised to indicate that the Final RFA Report was approved by Cal-EPA and that, at Cal-EPA's direction, additional investigation will be performed at several SWMUs/AOCs.**
- C-18 p. 3-10: The miscellaneous electronic equipment stored with hazardous waste stickers in the vicinity of a drum storage area must be checked and properly handled by the Marine Corps/Navy staff.
- R-18 According to the Station, the electronic equipment has been transported off-Station by the Defense Reutilization Marketing Office (DRMO).**
- C-19 P. 3-17: Please explain why concerns are limited to persistence of an aerial photo anomaly over time. Wouldn't an anomaly on a single aerial photo present possible concerns as well?
- R-19 The text in the Draft EBS Report is incorrect here and does not reflect the actual evaluation performed by the Jacobs Team on the aerial photograph review by SAIC. An anomaly on a single aerial photograph could be retained as an LOC in the EBS.**

The primary criteria used to identify anomalies as not warranted for inclusion as LOCs are as follows:

- **SAIC recommended no further action for the anomaly and the Jacobs Team agreed.**
- **The Jacobs Team's knowledge of the Station indicated the feature/anomaly was not correctly identified and should not be an LOC.**
- **The Jacobs Team performed some site inspections to verify that the anomaly should not be considered as an LOC.**

It should be noted that out of some 471 features/anomalies identified on-Station by SAIC, over 240 are incorporated as new LOCs or included in existing LOCs (e.g., IRP sites, SWMUs, etc.) in the Draft EBS Report. This represents a percentage somewhat higher than 50 percent.

C-20 P. 3-13: Please provide the criteria for the non-PCB determination for items which contain PCB concentration less than 50 mg/L.

R-20 Under the Toxic Substances Control Act (TSCA) (40 CFR 761), PCB equipment with PCB concentrations of 0 to 49 parts per million (ppm) are classified as "non-PCB items."

As discussed in a telephone conversation with EPA on 23 March 1995, if buildings contain PCB items that are currently operational and have not leaked, they can be categorized as Area Type 1. Based on available information, the PCB items identified in buildings at the Station are currently operating and have not leaked. Therefore, these buildings will be categorized as Area Type 1. The text will be revised to clarify that categorization of buildings containing PCB items is based on the operational status and condition of the PCB items and not the concentration of PCBs in the items.

C-21 P. 3-18 to 3-19: The practice of applying "waste petroleum and other miscellaneous liquid wastes" on the unpaved portions of the airfield for dust control requires additional assessment and consensus by the BCT to agree on the extent to which the practice may have resulted in contamination on the airfield. To the extent that this information cannot be better ascertained, these portions of the airfield should remain categorized as Category 7 property.

R-21 As agreed upon by the BCT, the airfield operation will be assessed as described in the response to C-7.

C-22 P. 3-23: In what ways was general construction refuse considered to be a Location of Concern? Was it suspected of hazardous substances?

R-22 The comment refers to a past fill area identified in interviews with current and former Station employees held on 26 May 1994. The interviewees said that fill activity (involving nonhazardous waste) took place in 1985 and continued for an unknown period of time. The interviewees said that the Station's Facilities Management Department (currently known as AC/S Installations) disposed of nonhazardous waste into this fill area, but they were not sure what other materials the Marines may have disposed of at this location. Because of this uncertainty, members of the original BCT felt that additional evaluation may be required to determine if hazardous substances were disposed of at this location. For this reason, the fill area is categorized as Area Type 7.

- C-23 P. 3-23. The Additional Landfill Area appears to underlie the golf course. Since the Navy plans additional investigation, the Navy should be conducting an evaluation of hazardous substances remaining on this property, not merely "hazardous waste," as stated. Furthermore, it is unclear that this area is eligible for uncontaminated status, unless investigation has already been conducted and the area has been determined to be clear.
- R-23 The Additional Landfill Area was categorized as Area Type 7 in the Draft EBS Report, and is planned for additional investigation. The Final EBS Report will include a discussion of the categorization rationale in Section 4.**
- C-24 p. 3-25: Regarding the history of pesticides on the property, the third paragraph on the page indicates that it is only spills or improper storage which implicate pesticide use. However, the property is not eligible for uncontaminated status if pesticides have been stored on the property. Storage of hazardous substances would place the area in category 2.
- R-24 At two of the parcels identified as CERFA-eligible in the Draft EBS Report (i.e., CP-6 and CP-16), a pesticide storage area exists. Based on the 06 March meeting, these storage areas will be considered LOCs and will be categorized as Area Type 2. In the Final EBS Report, these areas will be excluded from the Navy's request for concurrence on CERFA eligibility.**
- C-25 P. 3-28: Please provide justification for how the 2 known releases from adjacent property indicate a low potential for contamination of on-base property.
- R-25 On 14 March 1995, the Orange County Health Care Agency (OCHCA) was contacted to obtain information on the status of these two locations that were listed by OCHCA as having releases. According to OCHCA staff, remediation has been completed and cases closed. The sites have been removed from the OCHCA databases for tracking facilities with releases and, therefore, no impact to Station property will occur. The Final EBS Report will include a discussion of the status of these two facilities.**
- C-26 P. 4-2: "Property that falls under Area Types 2, 3, and 4 does not meet the strict definition for CERFA-eligible property, but is nevertheless believed to be uncontaminated by the Navy." EPA disagrees with this statement; see General Comment 1.
- R-26 The Navy agrees that Area Types 2, 3, and 4 will not be considered "uncontaminated" and will not be requested for CERFA eligibility.**
- C-27 P. 4-12, PCB transformers: It appears that the Navy has classified as Category 2 any area where a PCB transformer may have been located. See General Comment 3.

- R-27 PCB transformer locations with no leakage will be classified as Area Type 1 in the Final EBS Report. See response to C-3.**
- C-28 P. 4-16, Section 4.2.11: The conclusion that five distinct groundwater contamination plumes have been identified at MCAS El Toro may no longer be applicable as groundwater sampling has not been completed since fall of 1993.
- R-28 As discussed in the response to C-5, the latest groundwater monitoring information available for MCAS El Toro is derived from sampling performed in June 1993 to December 1993. In the Draft EBS, plumes were drawn to MCL contours. With the change to plotting contours to the non-detect lines, a few additional "plumes" (typically very small) will be plotted on the base map for the Final EBS Report. Thus, more than five plumes will be shown on the map.**
- C-29 P. 4-16: Please provide documentation to support the statement that "pesticides were [not] applied improperly."
- R-29 There is no available information to indicate that pesticides may have been applied improperly. Confirmation sampling was performed at the agricultural areas at the Station to obtain evidence to support the Navy's determination that these areas do not have elevated levels of residual pesticide. The results of the confirmation sampling program will be included in the Final EBS Report.**
- C-30 Table 4-2: Pages 1 through 5 list transformers that were removed; see General Comment 3 above. If transformers were functioning up to the time when removed, the property may be eligible as Category 1 property.
- R-30 There is no available information to determine whether an inactive transformer may have been stored at its original location for an extended period of time (e.g., more than 1 year). Because the Station has used several storage yards in the past to store old PCB transformers, it is assumed that the transformers were usually removed from their original location soon after being retired. Therefore, PCB transformer locations that did not have documented releases will be considered as Area Type 1. Also, see response to C-3.**
- C-31 Table 4-2: Pages 13 and following include some areas as Category 7 for the reason that they are identified as "wet soil" or "liquid". Please state why this evidence is sufficient justification for identifying a property as Category 7. Similarly, many areas are LOC/Category 7 because they contain "Stain". As discussed in General Comment 7 above, evidence of incidental releases of petroleum products on roadways and parking lots would still allow EPA to concur on that property as uncontaminated unless there were more specific reasons to disqualify these areas.

- R-31 The LOCs referenced on pages 13 and 14 of Table 4-2 were identified only from aerial photographs (refer to LOC Reference column in table). These LOCs will require further evaluation and, therefore, are considered Area Type 7.**
- C-32 P. 5-2, CERFA-Eligible and Other Uncontaminated Property: This exercise is not useful, because only uncontaminated property can be identified for concurrence. See General Comment 1. Although they can be considered for early transfer, areas which are noted as Category 2, 3, and 4 all require decision documentation in addition to the EBS and CERFA concurrence letter before transfer can occur.
- R-32 The Navy agrees that Area Types 2, 3, and 4 will not be considered "uncontaminated" and will not be requested for CERFA eligibility. See response to C-1.**
- C-33 Attachment 3, page 1, Parcels CP-10 and CP-11: Ordnance storage bunkers are identified on uncontaminated parcels CP-10 and CP-11. Please be aware that EPA considers ordnance to be a hazardous substance. However, if storage of ordnance has no impact on public health or the environment, EPA may have some discretion to concur on the property as uncontaminated pursuant to Section 120(h)(4). In order to determine this impact, it would be useful to review any information about possible leaks or releases to the environment of hazardous substances; any residual levels of hazardous substances due to history of storage on the parcels; whether the storage areas are contemplated for investigation under the IRP program; whatever ordnance is still being stored on the parcels; and whether the stored ordnance will be cleared prior to transfer. Please be aware that the storage of ordnance requires the Navy to comply with the notice requirements under CERCLA Section 120(h)(1), which requires information about the types of substances stored, the amounts stored, and dates of storage.
- R-34 Based on the 06 March meeting and a subsequent conference call with EPA on 16 March 1995, the current and former ordnance storage bunkers at the Station will be considered as LOCs and categorized as Area Type 2 in the Final EBS Report.**

TO: Ramon Mendoza/EPA

COPIES: Joseph Joyce/MCAS El Toro
Andy Piszkin/SWDIV

FROM: CH2M HILL Project Team

DATE: March 21, 1995

SUBJECT: Clarification of Miscellaneous Issues Related to Categorization of Locations of Concern, MCAS El Toro Environmental Baseline Survey

PROJECT: SCE70257.FT.07

This memorandum has been prepared in response to a telephone conversation between Ramon Mendoza/EPA and Tim Smith/CH2M HILL on 21 March 1995. During this conversation, it was requested that clarification be provided for three issues related to categorization of locations of concern (LOCs) in the MCAS El Toro EBS. These three issues are discussed below.

- (1) PCB Transformers. In comments on the Draft EBS Report dated 09 February 1995, EPA provided direction on categorization of PCB transformers, including PCB transformer locations and PCB transformer storage yards (refer to comments C-3, C-27, and C-30. The Navy has followed the rationale described by EPA and categorized locations with PCB transformers as follows:
 - Locations where PCB transformers are intact, not leaking, and in use in an electrical system, or where PCB transformers were intact and in use up to the time when they were removed, are categorized as Area Type 1. All but two PCB transformer locations meet these criteria and are Area Type 1. The remaining two transformers have documented releases and are Area Type 7.
 - PCB transformer storage yards at the Station (i.e., RFA SWMU/AOC 7, IRP Site 11, and transformer storage yard adjacent to tank 175), are categorized as Area Type 6 or 7.

The revised EBS figure submitted with the draft response to comments on 21 March 1995 reflects this rationale for categorization of PCB transformer locations and PCB transformer storage yards.

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- (2) SWMU/AOC 274 (Stockpiled Soil). Based on the visual site inspection performed during the RFA, the Navy has categorized this SWMU/AOC as Area Type 1 (no evidence of release or storage of hazardous substances were observed at this area). However, this SWMU/AOC overlies the main VOC plume and benzene plume near Tank Farm 2, which are categorized as Area Type 6. Therefore, the SWMU/AOC 274 location is not considered CERFA-eligible at this time because it overlies groundwater contamination.
- (3) Area Type 1 SWMUs/AOCs Overlying Contaminated Groundwater. Because EPA does not consider property overlying groundwater contamination plumes as CERFA-eligible, the Final EBS Report (i.e., Table 3-3) will indicate that Area Type 1 SWMUs/AOCs that overlie groundwater contamination are not CERFA-eligible. A list of the SWMUs/AOCs categorized as Area Type 1 is provided in the table attached to this memorandum. The table indicates which SWMUs/AOCs overlie groundwater contamination and, therefore, are not CERFA-eligible.

Table 1
Summary of SWMUs/AOCs Categorized as Area Type 1
MCAS EI Toro EBS - Memorandum

SWMU/AOC Number	Type	Comments	Overlie Contaminated Groundwater?	Area Type
1	Former Scrap Metal Yard	Near Golf course	No	1
2	Vegetation Piles	Near Golf Course	No	1
12	Active Sanitary Sewer Lines	Located throughout Station; carry sanitary wastes	Not applicable	1
74	Aircraft Wash Area	Located on Tarmac	Yes (main VOC plume)	1(a)
136	Aircraft Wash Area	Located on Tarmac	No	1
141	Aircraft Wash Area	Surface free of defects	No	1
150	Aircraft Wash Area	Located on Tarmac	No	1
152	Aircraft Wash Area	Located on Tarmac	No	1
178	Vehicle Wash Rack	No evidence of release	Yes (VOC plume near Site 5)	1(a)
210	Vehicle Wash Rack	Surface free of defects	Yes (benzene plume at TF 5/6)	1(a)
216	Vehicle Wash Rack	Surface free of defects	Yes (benzene plume near TF 2)	1(a)
219	Vehicle Wash Rack	Surface free of defects	No	1
245	Golf Course	Treated sanitary sewage applied	No	1
246	Golf Course Irrigation Tank	Stored treated sanitary sewage	No	1
247	Irrigation Pipeline	Transferred treated water from Former Sewage Treatment Plant to Irrigation Tank at Golf Course	No	1
268	Vehicle Wash Rack	Surface free of defects	Yes (benzene plume near TF 2)	1(a)
274	Stockpiled Soil	No evidence of release	Yes (main VOC plume and benzene plume near TF 2)	1(a)
297	Former Asphalt Pavement Plant	No remaining evidence of plant	No	1
299	Vehicle Wash Rack	Surface free of defects	Yes (main VOC plume)	1(a)
304	Trenches inside Building 359	Inside Bldg; No evidence of release	Yes (main VOC plume)	1(a)
305	Septic Tank	Sanitary waste	No	1
306	Septic Tank	Sanitary waste	Yes (chloroform plume at Station border)	1(a)
307	Septic Tank	Sanitary waste	No	1

NOTES:

(a) This SWMU/AOC overlies a groundwater contamination plume(s); therefore, it is not CERFA-eligible.