



UNITED STATES MARINE CORPS
MARINE CORPS AIR STATION
EL TORO (SANTA ANA), CALIFORNIA 92709-5001

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File: MCAS El Toro

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MCAS EL TORO
SSIC # 5090.3

IN REPLY REFER TO:

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22 DEC 1988

Ms. Karen Schwinn
Waste Compliance Branch (T-2-4)
U.S. EPA, Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Ms. Schwinn:

Your agency's letter of November 17, 1988 issued a warning letter to the Marine Corps Air Station (MCAS) El Toro concerning violations of the Resource Conservation and Recovery Act (RCRA). MCAS El Toro was required to submit the status of the corrective action for each potential violation listed in the accompanying report. The conditions giving rise to most of the potential violations have already been corrected and all others will be corrected in the near future. Details on these corrective actions are provided below:

1. 40 CFR 262.34(a) - Accumulation Time: Enclosure (1), a letter sent out to all hazardous waste (HW) generators at MCAS El Toro, strongly emphasizes the need for proper labelling of containers. Rigorous inspections will ensure correct labelling in the future. Enclosure (2) shows examples of the progress being made with respect to container labelling.
2. 40 CFR 265.13(b)(5)(6) - General Waste Analysis: Enclosure (3) contains an addition to the waste analysis plan which includes procedures for inspecting and analyzing each waste fuel shipment accepted from MCAS Tustin. Additionally, enclosure (3) contains methods of analysis for wastes in tanks and from the open burning/open detonation area. The entire waste analysis plan will be updated within the next several months. Enclosure (4) is the document which starts contractual arrangements to update this plan.
3. 40 CFR 265.13(c)(1)(2) - General Waste Analysis: The addition to the waste analysis plan in enclosure (3) includes procedures on HW movements and sampling methods for incoming wastes.
4. 40 CFR 265.15 - General Inspection Requirements: Regular inspections have always been performed at the facility but have not been properly documented. The inspection program contained in enclosure (5) will ensure that all inspections are performed and documented properly. Enclosure (6), sent to all HW generators, will help in coordinating the inspection program.

5. 40 CFR 265.16(a)(1) - Personnel Training: Periodic training has always been done at the facility but has not been properly documented or been broad enough in scope. Enclosure (7) is a newly developed training program which will correct these training discrepancies. Enclosure (6) will help to develop this training program.
6. 40 CFR 265.16(d)(2)(3)(4) - Personnel Training: Records will be established as the training program is implemented. A database will be developed to better track personnel training.
7. 40 CFR 265.17 - General Requirements for Ignitable, Reactive or Incompatible Wastes: Enclosure (8) contains requests to provide "No Smoking" signs in all areas. In addition, enclosure (1), sent to all HW generators, stresses the importance of labelling containers to prevent incompatible storage.
8. 40 CFR 265.31 - Maintenance and Operation of Facility: For over a year, three separate HW disposal contractors have been working at the station to dispose of the backlogged HW which created the danger of fire, explosion, or release of HW. After spending over \$400,000 at MCAS El Toro, the backlog has finally been eliminated. Enclosures (9) and (10) show the marked improvement in the cages and B.673T3. Enclosure (11) contains the HW manifests for the backlogged HW.
9. 40 CFR 265.32(a)(c)(d) - Required Equipment: Enclosure (12) contains the requests to provide the required equipment at B.673T3. The accumulation areas will be provided with equipment in accordance with enclosure (1). Please note that the cages will no longer be used for HW storage and B.673T3 will be the primary storage area. This change will be reflected in the update of our Part B permit application (see enclosure (4)).
10. 40 CFR 265.35 - Required Aisle Space: As shown in enclosures (9) and (10), the problem of inadequate aisle space has been eliminated in all storage areas.
11. 40 CFR 265.52(d) - Content of Contingency Plan: Enclosure (13) contains an amendment to the contingency plan which includes names, addresses, and phone numbers of all persons qualified to act as emergency coordinators and names one primary emergency coordinator. An evacuation plan will be added to the contingency plan when the plan is updated in accordance with enclosure (4).
12. 40 CFR 265.52(f) - Content of Contingency Plan: An evacuation plan will be added to the contingency plan when the plan is updated in accordance with enclosure (4).

13. 40 CFR 265.55 - Emergency Coordinator: Emergency coordinators have been designated. See enclosure (13).
14. 40 CFR 265.73(b)(13) - Operating Record: In accordance with the existing waste analysis plan, waste is identified by generator knowledge, the Hazardous Material Information System (HMIS), and Material Safety Data Sheets (MSDS). A laboratory analysis is run on all unknown waste. These analyses will be referenced in the operating record. Enclosure (14) is an example of this referencing.
15. 40 CFR 265.112(b)(1) - Closure Plan: Information on closing each HW unit and the expected year of final closure will be included in the closure plan when it is updated in accordance with enclosure (4).
16. 40 CFR 265.171 - Condition of Containers: The backlogged HW, which was responsible for this potential violation, has been disposed of. For documentation, see enclosures (9), (10), and (11).
17. 40 CFR 265.173(a)(b) - Management of Containers: Enclosure (1), sent to all HW generators, conveys the need to keep all HW containers closed when not in use. The problem of stacking containers will be corrected.
18. 40 CFR 265.174 - Management of Containers: As stated in item 4 above, inspections are being done and a comprehensive inspection program has been developed and will be implemented.
19. 40 CFR 265.191 - Assessment of Existing Tank System Integrity: A four-year, \$7.5 million contract has recently been awarded to bring all tanks at the station into compliance with Federal, State, and local environmental regulations. The integrity assessment will be performed under this contract. Enclosure (15) contains the general work plan for the contract.
20. 40 CFR 265.194(b)(2) - General Operating Requirements: The above mentioned contract will provide the required overflow protection controls.
21. 40 CFR 265.195 - Inspections: Daily inspections will be conducted on all HW storage tanks. Enclosure (16) contains the inspection sheet for these inspections.
22. 40 CFR 265.198(a)(2) - Ignitable Wastes in Tanks: This potential violation has been corrected by ensuring all HW tanks are properly covered. Enclosure (17) documents this corrective action.
23. 40 CFR 268.7 - General Waste Analysis: As stated in the existing amendment to our waste analysis plan, which is shown in enclosure (18), knowledge of the waste is used to

determine whether the waste is restricted from land disposal. This evidence will be maintained in the operating record. All "California List" restricted wastes will have the required land disposal restriction notification.

24. 40 CFR 268.50(a) - Prohibitions on Storage of Restricted Wastes: All containers of restricted wastes will be properly marked. No restricted wastes are stored in tanks.

25. 40 CFR 270.71(a) and 40 CFR 270.72(B) - Changes During Interim Status: A revised Part A application will be prepared and submitted in accordance with enclosure (4).

If there are any questions concerning the above items, please contact Ensign Michael Rehor, Environmental Director, at (714) 726-2821.

Sincerely,



D. V. SHUTER
Brigadier General, U.S. Marine Corp
Commanding General

Encl:

- (1) Letter to HW Generators
- (2) Photographs showing proper labelling
- (3) New Amendment to Waste Analysis Plan
- (4) Engineering Service Request for Contractual Support
- (5) Inspection Program
- (6) Letter for HW Coordinators
- (7) Training Program
- (8) Requests for signs
- (9) Photographs of storage cages
- (10) Photographs of B.673T3
- (11) HW Manifests
- (12) Requests for emergency equipment
- (13) Amendment to contingency plan
- (14) Example of referencing analyses
- (15) General Work Plan for underground tank contract
- (16) Inspection Sheet for HW tanks
- (17) Photographs of covered tanks
- (18) Existing amendment to waste analysis plan

Copy to: (w/o encl.)
CMC (LFL)
OICC, SW (18)
WESTNAVFACENCOM (18)