



UNITED STATES MARINE CORPS
MARINE CORPS AIR STATION
TUSTIN, CALIFORNIA 92710-8000

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LH *[Signature]*

IN REPLY REFER TO:
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1JG
03 OCT 1989

U.S. Environmental Protection Agency
CA Enforcement Section
Waste Compliance Branch
Attn: Mr. Steve Johnson
215 Fremont Street
San Francisco, CA 94105

Dear Mr. Johnson:

Your agency's letter of September 26, 1989 issued a warning letter to the Marine Corps Air Station (MCAS) Tustin concerning violations of the Resource Conservation and Recovery Act (RCRA). MCAS Tustin was required to submit the status of the corrective action for each potential violation listed in the accompanying report. The conditions giving rise to many of the potential violations have been corrected and all others will be corrected in the near future. We will be providing you with periodic updates on our progress in correcting the outstanding potential violations. Details on these corrective actions are provided below:

1. 40 CFR 262.34(a) - Enclosure (1) directs all generators not to store Hazardous Waste (HW) in the accumulation areas for greater than 90 days, with the 90-day period beginning when the first drop of HW enters the drum.
2. 40 CFR 262.41(a) - Per my staff's conversation with Ms. Jane Diamond of your Office of Waste Programs, the biennial report submitted by MCAS Tustin satisfies the RCRA requirement for a biennial report.
3. 40 CFR 265.13(b)(1) - The Waste Analysis Plan is currently being updated by contract. Funding for this update was provided by enclosure (2). This requirement will be incorporated into the update, which should be completed by January 1, 1990.
4. 40 CFR 265.13(b)(2) - This requirement will be incorporated into the Waste Analysis Plan update.
5. 40 CFR 265.13(b)(13) - This requirement will be incorporated into the Waste Analysis Plan update.
6. 40 CFR 265.13(b)(4) - This requirement will be incorporated into the Waste Analysis Plan update.
7. 40 CFR 265.13(b)(6) - This requirement will be incorporated into the Waste Analysis Plan update.

8. 40 CFR 265.14(b)(2) - Enclosure (3) is a request to provide fencing around building 23A. This will provide a mechanism to control entry onto the active portions of the facility.
9. 40 CFR 265.15(a) - Regular inspections of the bunker storage areas are now being performed. Enclosure (4) is an example of these inspections.
10. 40 CFR 265.15(b)(1) - Inspections are now being performed in accordance with the inspection plan. Enclosure (4) is an example of these inspections.
11. 40 CFR 265.15(b)(2) - The inspection schedule is now kept at the Main Storage Area, building 248.
12. 40 CFR 265.15(c) - Immediate corrective actions to remediate hazards will be carried out in the future. All stained areas noted during the inspection will be cleaned up by removing contaminated soil/asphalt and disposing of the removed material as HW.
13. 40 CFR 265.15(d) - Inspection logs for the Main Storage Area and building 23A now include a notation of the observations made. See enclosure (4).
14. 40 CFR 265.17(b)(1)-(5) - All containers in the building 23A area have been closed. Berms will be provided in the building by November 1, 1989 (see enclosure (5)) and containers will be properly segregated. After the berms are constructed, the outside area will only be used for staging prior to disposal. These actions will prevent potential threats to human health or the environment.
15. 40 CFR 265.31 - All containers in the building 23A area have been closed. Berms will be provided in the building by November 1, 1989 (see enclosure (5)) and containers will be properly segregated. After the berms are constructed, the outside area will only be used for staging prior to disposal. These actions will minimize the possibility of a fire, explosion, or unplanned release.
16. 40 CFR 265.32(a) - An internal communication system (alarm system) has been ordered by enclosure (6). Enclosure (1) has been sent out to all generators directing that internal communication systems be provided at all accumulation areas.
17. 40 CFR 265.32(b) - A portable telephone is available at building 23A. See enclosure (7). Enclosure (1) has been sent to all generators directing that external communication systems be provided where necessary.
18. 40 CFR 265.32(c) - An eyewash, safety shower, and fire extinguisher are already available at building 23A. See enclosure (8). Respirators will be provided.

19. 40 CFR 265.32(d) - Water at adequate volume for fire control is available at all accumulation areas. Fire hydrants, located throughout the station, provide sufficient water for fire control at the accumulation areas.
20. 40 CFR 265.33 - Emergency equipment will be regularly tested and maintained. The testing and maintenance will be incorporated into the inspection schedule.
21. 40 CFR 265.34 - An internal communication system has been ordered by enclosure (6).
22. 40 CFR 265.35 - As evidenced by enclosure (9), adequate aisle space has been established at building 23A.
23. 40 CFR 265.52(e) - The Contingency Plan (Spill Prevention, Control, and Countermeasure Plan) is currently being updated by contract. Funding for this update was provided by enclosure (2). This requirement will be incorporated into the update, which should be completed by January 1, 1990.
24. 40 CFR 265.52(f) - This requirement will be incorporated into the Contingency Plan update.
25. 40 CFR 265.73(b)(2) - We do have a mechanism in place to identify the location of each HW stored on station. All HW drums ready to be moved to buildings 248 or 23A are numbered, logged, and tracked until final disposal. See enclosure (10). Additionally, we are procuring the bar coding system in enclosure (11) to more efficiently track all HW.
26. 40 CFR 265.112(b)(1) - The Closure Plan is currently being updated by contract. Funding for this update was provided by enclosure (2). This requirement will be incorporated into the update, which should be completed by January 1, 1990.
27. 40 CFR 265.112(b)(4) - This requirement will be incorporated into the Closure Plan update.
28. 40 CFR 265.112(b)(6) - This requirement will be incorporated into the Closure Plan update.
29. 40 CFR 265.112(b)(7) - This requirement will be incorporated into the Closure Plan update.
30. 40 CFR 265.171 - All HW containers in buildings 248 and 23A that are in poor condition will be overpacked and disposed of by October 30, 1989.
31. 40 CFR 265.173(a) - All HW containers in buildings 248 and 23A are now closed. Inspections of the facilities will ensure all containers remain closed.

32. 40 CFR 265.173(b) - All damaged HW containers in building 23A will be overpacked and disposed of by October 30, 1989.

33. 40 CFR 265.174 - Weekly inspections are now being performed at building 23A. See enclosure (4).

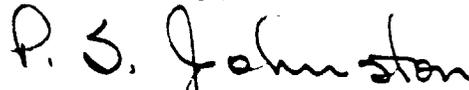
34. 40 CFR 265.177(c) - Berms are being provided at building 23A (see enclosure (5)) and incompatible waste will be properly separated.

35. 40 CFR 270.71(a)(3) - The Part A application is currently being updated by contract. Funding for this update was provided by enclosure (2). The capacity of building 248 will be revised in this update to reflect actual storage quantities.

36. 40 CFR 270.72(b) - The Part A application update will include building 23A as a storage area. In the future, the Part A application will be revised prior to changing HW operations.

If there are any questions concerning the above items, please contact LTJG Michael Rehor, Environmental Director, at (714) 726.2821.

Sincerely,



P. S. JOHNSTON
Colonel, U.S. Marine Corps
Commanding Officer

Encl:

- (1) Letter to HW Generators
- (2) NAVCOMPT Form 2275
- (3) Work request for fencing
- (4) Example of inspection
- (5) Work request for berms
- (6) Request for internal communications
- (7) Photograph of telephone (B.23A)
- (8) Photographs of emergency equipment (B.23A)
- (9) Photographs of properly separated drums (B.23A)
- (10) HW log
- (11) Information on Bar Coding System

Copy to: (w/o encl.)
CMC (LFL)
CO, EFA-SW (18)
DHS