

DEPARTMENT OF TOXIC SUBSTANCES CONTROL M6005

M60050.000723
MCAS EL TORO
SSIC # 5090.3Region 4
245 West Broadway, Suite 350
Beach, CA 90802-4444

1994 MAY 20 PM 2:42

May 17, 1994

Mr. Bret Raines
BRAC Environmental Coordinator
Southwest Division
Naval Facilities Engineering Command
Code 1831.BR
1220 Pacific Highway
San Diego, California 92132-5181

Dear Mr. Raines:

**APPROVAL WITH MODIFICATIONS OF MARINE CORPS AIR STATION EL TORO,
EL TORO, CALIFORNIA, INSTALLATION RESTORATION PROGRAM, FINAL RCRA
FACILITY ASSESSMENT [RFA] REPORT**

In a letter dated January 24, 1994, the California Department of Toxic Substances Control (DTSC) indicated that it had completed its review of the subject **Final RFA Report** (Volumes I through V) dated July 16, 1993. At the time, we did not approve the **Final RFA Report** because several Solid Waste Management Units/Areas of Concern (SWMUs/AOCs) that were recommended for further action had not been incorporated into the Remedial Investigation/Feasibility Study (RI/FS) program as Operable Unit (OU)-4 or another program for corrective and/or remedial action. Moreover, DTSC recommended additional SWMUs/AOCs for further action.

Enclosed with this letter are modifications that need to be made. These modifications may be made by attaching the enclosure to the **Final RFA Report**.

DTSC hereby approves the **Final RFA Report** with the specified modifications. If you have any questions concerning this matter, please contact me at (310) 590-4920.

Sincerely,

Albert A. Arellano, Jr., P.E.
Region 4 Base Closure Unit
Office of Military Facilities

Enclosure
cc: See next page.

Mr. Raines
May 17, 1994
Page 2

cc: Mr. Andy Piszkin
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**DTSC MODIFICATIONS TO
FINAL RFA REPORT**

MCAS EL TORO

The following SWMUs/AOCs and underground storage tanks (USTs), that DTSC identified in the January 24, 1994 letter, have been incorporated into the **Base Realignment and Closure (BRAC) Cleanup Plan (BCP)** dated March 21, 1994 and recommended for further action. Please see the DTSC letter dated January 24, 1994 for additional information on these SWMUs/AOCs and USTs.

SWMUs/AOCs:

- 84 (oil/water separator [OWS] 298-C)
- 145 (UST 529 - Waste Oil)
- 151 (OWS 605-C)
- 173 (OWS 671)
- 175 (OWS 672-A)
- 176 (UST 672-B)
- 199 (OWS 759-A)
- 298 (UST 392 - Waste Oil)

USTs:

- at Tank Farms 2, 3, 5 and 6
- 240-A (removed); replaced by UST-797
- 398 (commonly known as Tank 398)

We require that the **BCP** be modified to address further action at the following SWMUs/AOCs (again, please see the DTSC letter dated January 24, 1994 for additional information):

- 7 (Transformer Storage Site)

The one sample location investigated during the RFA did not necessarily characterize this site.

- 9 (Fuel Bladder)

The RFA investigation provided no evidence that petroleum hydrocarbon contamination is limited to 5 feet below ground surface (bgs). Total fuel hydrocarbon (TFH)-diesel was detected at 5 feet bgs at a concentration of 414 parts per million (ppm); deeper samples were not collected. The potential for contamination at deeper depths should be investigated.

DTSC Modifications to **Final RFA Report**
May 17, 1994

- 244 (Polychlorinated Biphenyl [PCB] Spill Area)
The extent or absence of possible residual contamination should be confirmed.
- 267 (Drop Tank Fuel Storage Area)
This SWMU/AOC was recommended for a sampling visit in the **Draft Preliminary Review/Visual Site Inspection (PR/VSI) Report**, dated July 3, 1991, but was not sampled during the RFA investigation.
- Hazardous Waste Satellite Accumulation Areas
Decontamination and/or removal strategies (e.g., at concrete pad structures) should be evaluated.

We require that the **Tank Management Plan (TMP)**, being developed as part of base closure, address the following UST, aboveground storage tank (AST) and OWS concerns:

- 20 (UST T-C - Waste JP-5)
The RFA investigation provided no evidence that petroleum hydrocarbon contamination is limited to 5 feet bgs. TFH-diesel was detected at 5 feet bgs at a concentration of 463 ppm; deeper samples were not collected. The potential for contamination at deeper depths should be investigated.
- 48 (UST 178 - Waste Oil)
The 10 foot depth sample (top sample) of angle boring A1 with a total petroleum hydrocarbon (TPH) result of 822 ppm indicates possible surficial soil contamination. At a minimum, additional analyses should consist of semivolatile organic compounds, metals and petroleum hydrocarbons.
- 65 (UST 240-B)/66 (OWS 240-C), 205 (OWS 761-A)/206 (UST 761-B), and 211 (OWS 763-A)/212 (UST 763-B)
At these three OWS systems, the OWS and UST are separated by approximately 15 to 20 feet and only one 25 foot boring, situated between the two units, was used for the RFA evaluation.

DTSC Modifications to **Final RFA Report**
May 17, 1994

- 129 (UST or OWS 445-C - Waste Oil)

An observed stained area identified in the **Draft PR/VSI Report** should be investigated. The stained area is approximately 4 feet in diameter and about 25 feet west of the wall of Building 445 and 12 feet south of the concrete pad surrounding the pump units.

- 231 (UST 899-E - Waste Oil)

Even though RFA sample results did not indicate contamination, additional investigation and/or removal is recommended for this UST which failed a tank test conducted in 1990.

- 260 (AST - JP-5)

The **TMP** or **BCP** should include a proposal to evaluate the large stain observed on the pavement of this former storage tank. Since the pavement was cracked at the stain area, it is possible that soil may have been impacted by releases.

We require that the **TMP** evaluate strategies for the following OWSs that apparently were not investigated in the RFA but were identified in an OWS survey report (April, 1993) prepared by Law/Crandall:

- B-658
- B-744
- 280
- 324
- 371
- 802
- 845
- 850/851
- 892
- 896
- 897
- 1702