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MCAS EL TORO
SSIC # 5090.3

JACOBS

TES IV

TITLE: TES IV REPORT ON MCAS EL TORO, 1987
AUTHOR: JACOBS ENGINEERING GROUP, INC.
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**JACOBS ENGINEERING GROUP INC.
ENVIRONMENTAL SYSTEMS DIVISION**

IN ASSOCIATION WITH:
TETRA TECH
METCALF & EDDY
ICAIR LIFE SYSTEMS
KELLOGG CORPORATION
GEO/RESOURCE CONSULTANTS
BATTELLE PACIFIC NORTHWEST LABORATORIES
DEVELOPMENT PLANNING AND RESEARCH ASSOCIATES

TES IV WORK ASSIGNMENT #127
RCRA COMPLIANCE EVALUATION
INSPECTION

MARINE CORPS AIR STATION - EL TORO
CA6170023208

MAY 1987



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

November 30, 1987

In Reply: T-2-4
Refer to: CA6170023208
El Toro MCAS

Base Commander
El Toro Marine Corps
Air Station
Attention: Beverly Van Cleef
EEPB (Code 1JG)
Facility Management Department
Santa Ana, CA 92709

Dear Commander:

On March 5, 1987, an inspection was conducted at the El Toro Marine Corps Air Station, Santa Ana, CA, under authority granted in §3007 of the Resource Conservation and Recovery Act, by Carole Missirlian and Jose Fernandez of Jacobs Engineering Group, as authorized representatives of the Environmental Protection Agency. A copy of the inspectors' report is enclosed.

EPA routinely provides copies of investigation reports to state agencies. Such releases will be handled according to the basic rules governing business confidentiality claims contained in the Code of Federal Regulations (40 C.F.R., §2). Any claim of confidentiality should be made within fifteen (15) working days from the receipt of this letter. EPA will construe a failure to furnish timely comments as a waiver of the confidentiality claim and, unless such a waiver is requested, in mid-December a copy of the report will be sent to the California Department of Health Services.

Should you have any questions regarding the report, please contact Elaine Schimmel, California Enforcement Section, at (415) 974-7963.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Philip L. Bobel".

for Philip L. Bobel
Chief
Waste Programs Branch

Enclosure

cc: John Sudol, NAVFACENCOM, San Diego, w/enc.

INSPECTION REPORT
PREPARED FOR
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9
TOXICS AND WASTE MANAGEMENT DIVISION
COMPLIANCE AND RESPONSE BRANCH
RCRA Compliance Evaluation Inspection

Facility: Marine Corps Air Station - El Toro
Santa Ana, CA 92709

**EPA
Identification
Number:** CA6170023208

**Date of
Investigation:** March 5, 1987

Investigators: Carole Missirlian, Environmental Engineer
Jose Fernandez, Environmental Engineer
Jacobs Engineering Group, Inc.

**Facility
Representative:** Beverly Van Cleef
Environmental Engineer

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1.0 INTRODUCTION

On March 5, 1987, a RCRA Compliance Evaluation Inspection (CEI) was performed by Jacobs Engineering Group Inc. (Jacobs) personnel at the Marine Corps Air Station (MCAS), El Toro. This inspection was performed in partial fulfillment of the Technical Enforcement Support (TES) IV, Work Assignment #127, for EPA Region IX.

This inspection report consists of a discussion of the facility's RCRA background; a summary of the facility's reported hazardous waste management practices; review of pertinent facility documents; observations made during the inspection; areas/items that were not inspected during the facility visit due to time constraints and logistics of this work assignment; and a listing of potential violations. This report is supplemented with documentation requested by the investigators during the visit and copies of the following checklists, if applicable:

- o Form A: Interim Status Standards for Facilities that Treat, Store or Dispose of Hazardous Wastes (please see Attachment A),
- o RCRA F-Solvent Land Restriction (please see Attachment B)
- o HSWA Requirements (please see Attachment C), and
- o O and P, Incineration and Thermal Treatment.

2.0 BACKGROUND AND FACILITY OPERATIONS

The MCAS-El Toro maintains and operates facilities and provides services and material to support operations of a U.S. Marine Corps aircraft wing. The facility operation involves storage of hazardous wastes generated by the aircraft and vehicle maintenance, degreasing, dry cleaning and painting activities.

According to the final Hazardous Waste Facility Permit (issued on June 30, 1986 and provided as Attachment D), the hazardous wastes which are stored in the facility consist of the following materials:

- 330 gallons per year (gal/yr) of spent solvent,
- 1,900 gal/yr of dry cleaning solution,
- 330 gal/yr of paint waste,
- 48,000 gal/yr of lube oil,

- 26,000 gal/yr of hydraulic oil,
- 360 batteries per year,
- 36 pounds per year of lithium batteries,
- 246,000 gal/yr of jet fuel,
- 360 gal/yr of transmission fluid,
- 2,200 gal/yr of diesel fuel,
- 1,254 gal/yr of various solvents,
- 2,000 oily rags per year,
- 1,200 lbs/yr of calcium hypochlorite,
- 120 lbs/yr of asbestos,
- 660 gal/yr of contaminated water,
- Small quantity of miscellaneous chemicals (occasional discoveries in various stores in the facility) and 200 gallons of PCB in transformers.

The hazardous wastes are accumulated in drums within protected areas (at their point of generation) prior to their storage at different sites throughout the Base. According to the Hazardous Waste Facility Permit, the storage areas consist of six drum storage concrete pads measuring approximately 600 square feet in total; these areas store a maximum of 120 55-gallon drums. It should be noted, however, that there is a total of nine locations (six permitted hazardous waste storage concrete pads, and three non-permitted additional sites (hangar #673T3, bunker #445, and FS smoke storage area next to Area #772)) that are currently also used as permanent hazardous waste storage areas. These areas are located on the map provided as Attachment E. Site photographs are provided as Attachment F.

3.0 DOCUMENT REVIEW

The permit history of the facility is presented in a chronological order:

On November 14, 1980, the MCAS - El Toro submitted an initial Part A permit application as a hazardous waste generator and storage facility to EPA. The following hazardous wastes and estimated annual quantity were listed in the application:

<u>EPA Hazardous Waste No. or Description</u>	<u>Estimated Annual Quantity (lbs)</u>
U159 (2-Butanone)	19,000
U220 (Methyl Benzene)	2,500
U161 (Methyl Isobutyl Ketone)	12,500
U228 (Trichloroethylene)	830
U210 (Tetrachloroethylene)	3,320
Lube Oil	48,000
Hydraulic fluid	4,800
F017 (paint wastes)	300
Pesticide containers	100
D002 (battery acids)	800
U222, U239 (Stoddard solution, 1,1,1-Trichloroethane, Xylene)	3,200

The wastes were to be stored on-site in containers (barrels, drums, etc.), with a total volume of 5,000 gallons, and in tanks with a total volume of 50,000 gallons.

On February 4, 1981, a revised hazardous waste permit application was forwarded to EPA. The application added the area used by the Defense Property Disposal Office, an MCAS tenant, to store hazardous waste containers for the purpose of sale and reclamation.

On March 4, 1981, the EPA reviewed the Part A application for completeness and determined that it was incomplete. According to the Part A rating sheet dated May 26, 1981, the facility had an excessive number of drums in storage. It was also noted that the storage areas needed upgrading and that there were signs of waste spillage. There is no record in the file information reviewed by Jacobs staff documenting that the deficiencies were remediated.

On January 11, 1983, EPA granted Interim Authorization to the State of California to operate Phase II, Component A of its hazardous waste program in lieu of the Federal program. As of that date, the facility fell under State jurisdiction and the Part A permit application was transferred to the California Department of Health Services (DHS).

On February 27, 1986, the DHS received a copy of the facility's Operation Plan for Temporary Hazardous Waste Collection Facilities which constituted the Part B application.

On April 25, 1986, the DHS issued a draft permit to the facility. A copy of the draft permit was sent to public agencies and legal notice was published in a newspaper and broadcast over radio stations. The final Hazardous Waste Facility Permit was issued on June 30, 1986. The effective date of this permit was June 30, 1986 and it expires on June 30, 1991. The issuance of the permit is subject to certain conditions (please see Attachment D).

On July 29, 1986, the DHS received a copy of a revised (new) Part A application (please see Attachment E). This revised application was requested by the DHS when the Defense Property Disposal Office changed their name to the Defense Reutilization and Marketing Office in 1985. Hazardous wastes and estimated annual quantities were listed in the MCAS - El Toro revised Part A application. Both EPA and DHS hazardous waste identification numbers or descriptions were used in this document (for example spent non-halogenated solvents are listed "F003" as specified in 40 CFR 261.31 and halogenated solvents are listed "211" as specified in the "Instructions for 1986 Annual TSD Facility Report" issued by the DHS). It should be noted that it is not possible to exactly match the hazardous waste descriptions and quantities listed in the DHS permits (06/30/86) conditions and in the 1986 Part A application since different names or groups of names and units are utilized. The following hazardous wastes and estimated annual quantities were listed in the 1986 revised Part A:

<u>EPA Hazardous Waste No. or Description</u>	<u>Estimated Annual Quantity (lbs)</u>
F003 (spent non-halogenated solvents)	35
D003 (reactive waste)	255
<u>California State Hazardous Waste No. or Description</u>	<u>Estimated Annual Quantity (lbs)</u>
151 (Asbestos containing waste)	7,500
141 (Off-specification, aged, or surplus inorganics)	400
135 (Unspecified aqueous solution)	450,000
331 (Off specification, aged or surplus organics)	7,350
352 (Other organic solids)	3,700
181 (Other inorganic solid waste)	770
461 (Paint Sludge)	56,680

512 (Other empty containers 30 gal or more)	35,400
513 (Empty containers less than 30 gal)	4,230
551 (Laboratory waste chemicals)	123
212 (Oxygenated solvents: octane, butanol, ethylacetate)	400
211 (Halogenated solvents: chloroform, methyl chloride, perchloroethylene)	2,800
213 (Hydrocarbon solvents: benzene, hexane, Stoddard solution)	17,000
214 (Unspecified solvent mixture)	8,000
221 (Waste oil and mixed oil)	600,000
611 (Contaminated soil)	700
261 (Polychlorinated biphenyls and material containing PCBs)	500

The wastes were to be stored on site in containers (barrels, drums, etc.) with a total volume of 5,800 gallons (approximately 115 55-gallon drums), and in tanks with a total volume of 175,000 gallons.

4.0 SITE INSPECTION

The inspectors arrived at the facility and presented their letters of identification to the guard at the main entrance gate. There they met the facility representative to whom they explained the inspection procedures.

The facility representative, previously notified by telephone, had made available documents relevant to RCRA inspections. The documents included:

- Facility map, documenting all hazardous waste storage areas;
- Draft Operation Plan for temporary hazardous waste collection facilities that has been submitted to the DHS as part of the Part B application;
- Waste Manifest Records;

- Final State Hazardous Waste Facility (Part B) Permit;
- Draft Contingency Plan;
- Revised Part A Application (1986);
- Draft Annual Facility Hazardous Waste Report for 1986;
- Inspection Records;
- Operating Records;
- Training Program;
- Waste analyses;
- Biennial Report for 1985; and
- Draft Hazardous Waste Analysis Plan and Closure Plan.

The investigators first proceeded on a facility tour under the guidance of the facility representative. The inspectors then reviewed the submitted documents and interviewed the facility representative in order to establish an understanding of the facility's activities and methods of storage/disposal of hazardous wastes.

All eight of the hazardous waste collection facilities identified in Section 2.0 were observed during this tour and are described in this section. A site location map and photographs are provided in Attachments F and G, respectively.

Area #445

Building #445 is a reinforced concrete structure (bunker) located near the southern boundary of the base. This building was once used as a test room for jet engines. The walls are approximately one foot thick. Building #445 is not a permitted hazardous waste storage area.

The entrance is an armored door posted with "No Parking" and "Caution PCBs" signs. There is no dike or containment berm at the entrance. The building contains the following hazardous materials or wastes:

- Ten 55-gallon drums containing asbestos contaminated materials;
- Asbestos pipes and asbestos tiles in plastic bags;
- One 55-gallon drum labelled STB (Super Tropical Bleach), although, according to the facility representative, this drum was probably mislabelled and does not contain STB;
- Two PCB transformers;
- Approximately 12 empty 55-gallon drums that previously contained paint wastes;
- Absorbent pads for fuel spills; and
- Approximately twelve 5-gallon drums containing contaminated soil absorbent.

No hazardous waste sign was posted on the door; only a PCB sign was posted. Approximately 80% of the drums lacked adequate labelling (no accumulation dates, proper D.O.T shipping name or manifest document number. Please see photograph #1 in Attachment G.)

Storage Area #778

This storage area consists of a completely fenced and roofed concrete storage pad with a berm. The surface area is approximately 80 square feet. Hazardous waste warning signs in English and Spanish are posted on the fence. Drums were stored inside the fenced pad. The following containers were identified at the site:

- Twelve 55-gallon drums containing waste paint products and removers;

- One 55-gallon of spill residues containing sodium hydroxide;
- Eleven 5-gallon drums containing waste cleaning compounds and trichlorofluoromethane; and
- Cans of sealant waste dated 1983.

Approximately 70% of the drums stored in the area #778 lacked adequate labelling (no accumulation date, D.O.T. shipping name or manifest document number). Some labels were not legible. There was no fire fighting, spill control or other emergency equipment staged at the site. However, a van, utilized by the Environmental Division at the Base, carries a first aid kit, fire extinguisher, absorbent and other emergency equipment.

Storage Area #772

This storage area consists of a concrete storage pad similar to the one previously described. Drums are stored inside and outside the fenced pad. The following containers were stored within the concrete pad:

- Five unidentified (no labels) fifty-five gallon drums;
- Three unidentified (no labels) five-gallon drums; and
- Miscellaneous laboratory packs.

Approximately one hundred 55-gallon drums containing chlorosulfonic acid and sulfur trioxide (FS smoke) solution were stored outside the concrete pad on the unpaved ground, stacked on wooden pallets. To prevent uncontrolled dumping or access, a fence was installed to enclose these drums. This area, located next to the permitted fenced concrete pad, has no roof (please see photograph #2 in Attachment G).

Many of the chlorosulfonic acid/sulfur trioxide drums either lacked adequate labelling (no accumulation date) or the labels were not legible due to sun or rain exposure. Some drums were corroded.

Outside the FS smoke drums fenced area, approximately seventy-five empty 55-gallon drums (some of them with no lid), containing rain water or other liquids, were stored on wooden pallets (please see photograph #2 in Attachment G).

There was no fire fighting, spill control or other emergency equipment staged at the site.

Storage Area #770

This covered storage area, consists of a fenced concrete storage pad with a berm. The following containers were stored at the site:

- One 5-gallon drum of corrosion preventative liquid;
- Two 5-gallon drums containing paint thinners;
- One 5-gallon drum containing waste paint;
- Six empty 5-gallon drums; and
- One unidentified 55-gallon drum (outside the fenced storage area).

There was no decontamination, fire or spill control equipment staged in this area.

Storage Area #769

This area, similar to the others, contained many drums outside the designated pad. To prevent additional uncontrolled drum storage, a second fence has been built around the concrete storage pad. The second fence encloses the drums that were stored outside the fenced concrete pad. The following containers were stored at the site:

- Approximately two hundred 55-gallon drums and one hundred 5-gallon drums containing paint sludges, ethylene glycol, waste oil or unidentified compounds; and
- Approximately 20 spent batteries.

There was no decontamination, fire or spill control equipment staged in the area. Approximately 90% of the drums lacked adequate labelling. Most of the drums were unidentified (please see photograph #3 in Attachment G). Some containers were open or in poor condition (please see photograph #4 in Attachment G). Approximately 95% of the drums were stored on wooden pallets or on the bare soil.

Storage Area #771

This storage area consists of a fenced and roofed concrete storage pad with a berm. The following containers were stored at the site:

- Five 55-gallon drums containing soda ash or acid residues;
- Six 20-gallon drums containing acid residues or paint wastes or spent thinners;
- Six empty 20-gallon drums; and
- Approximately fifty 1-gallon plastic containers containing miscellaneous acids (please see photograph #5 in Attachment G).

There was no decontamination, fire or spill control equipment staged in this area. The bottoms of some drums were immersed in rain water that had accumulated in the contained area. The drums did not show damage by corrosion.

Storage Area #779

This storage area has the same design as those previously described. Some drums were stored within the concrete pad, others on wooden pallets outside the fenced area (Please see photograph #6 in Attachment G), and others on the bare soil.

The following containers were stored within the concrete pad storage area:

- Four empty 55-gallon drums;

- Two 55-gallon drums containing graphite epoxy composite material; and
- Two 55-gallon drums containing corrosion preventative waste compounds.

The following containers were stored outside the concrete pad storage area:

- Nine 55-gallon drums containing coating compounds and rags;
- Forty-two 55-gallon drums containing waste paints, spent fuels and oils, waste paint thinners and trichlorofluoroethane;
- Twenty 55-gallon drums containing "speedy dry" (solid absorbent contaminated with spilled fuel) JP5 fuel, wax and oily rags; and
- Twenty-five 5-gallon drums containing paint thinner.

Some drums, stored outside the concrete pad, on wooden pallets, were in preparation for transportation. Some of the containers had no lid and showed traces of spillage. (See photograph #7 in Attachment G).

Solvent odor could be easily detected in the ambient air. Few containers had adequate labelling. There was no decontamination, fire or spill control equipment staged in this area.

Area #673T3

This storage area has been used since September 1986 and consists of a roofed hangar with an asphalt floor which is slightly sloped towards the western end of the building (Please see photograph #8 in Attachment G), where a berm was installed to contain accidental spills (Please see photograph #9 in Attachment G). Hanger #673T3 is not a permitted hazardous waste storage area.

The following containers were stored on asphalt under the metal roof:

- Approximately 300 55-gallon drums and 100 5-gallon drums containing various compounds such as paint and solvent wastes, JP5 fuel, hydraulic fluid, waste TCE and trichlorotrifluoroethane, Super Tropical Bleach,

contaminated clothes, spill residues, paint thinners, and empty oil cans; and

-Twenty 85-gallon drums containing spent hydraulic fluid.

The following containers were stored outside the roofed area on wooden pallets, on the asphalt pad:

- One hundred 55-gallon drums containing waste paints, "speedy dry" absorbent, trichlorotrifluoroethane, oily rags and contaminated clothing; and
- Ten 5-gallon drums containing spent cleaning compounds.

Several drums were corroded. About 70% of the drums lacked labelling. A spill in the western portion of the hangar (please see photograph #10 in Attachment G) was awaiting clean-up.

According to the facility representative, a wrong type of absorbent has been used in attempting to clean the spill. The spilled waste compound thickened into a molasses like material. Written direction was requested before proceeding. The steps that will be taken to clean up this spill are described in the memorandum provided as Attachment F. There was no fire control or other emergency equipment staged in the area.

Incompatible wastes might be stored at this site. It is, however, not possible to positively identify such an incompatibility, since most of the drums do not have an identification label.

Generation Area near Area #779

A self-contained concrete pad near Area #779 is used to store hazardous wastes generated by the nearby aircraft cleaning and maintenance activities. The concrete pad was found to be in good condition. The five 55-gallon drums that were stored at this site contained a mixture of JP5 fuel (60%), waste paint (20%), waste oil (10%), and hydraulic fluid (10%). The accumulation date showed an accumulation time of less than 90 days and the labelling was adequate. A spill of a red liquid that may have been hydraulic fluid or motor oil was awaiting clean-up.

F-Solvents Considerations

Waste F-solvents are generated and stored in drums at the facility. These wastes are transferred off-site via the Defense Reutilization and Marketing Office (DRMO). The DRMO initiates and administers the disposal contracts in accordance with all federal, state, and local laws, rules, and regulations, but does not maintain records of the precise method of treatment, storage, or disposal of each individual waste. All wastes are sent to State approved TSD facilities (please see hazardous waste manifests provided as Attachment I). The contract does, however, specify that the wastes must be recycled whenever feasible and prohibits landfilling of bulk chlorinated solvents.

Hazardous waste manifests tracking waste F-solvents were selected for inspection. These manifests (provided in Attachment I) included all the required information (and especially the name of the final destination of the waste F-solvents) and signatures. The RCRA F-solvent land restriction-treatment, storage, and disposal requirements checklist is provided in Attachment B.

Corrective Action Program Development

The facility has three types of Solid Waste Management Units which consist of aboveground and underground storage tanks containing waste oil and container storage areas. The HSWA Requirements checklist is provided as Attachment C.

5.0 AREAS NOT INVESTIGATED

Four underground storage tanks (three 50,000 gallon tanks and one 25,000-gallon tank) that contain waste oil were not inspected. A chemical analysis of these tanks was performed by an independent laboratory and no PCBs were detected. One waste generation area (near Area #779) was inspected. Other generation points throughout the base were not inspected.

6.0 LIST OF POTENTIAL VIOLATIONS

The following list of potential violations were identified. Citations are taken from 40 CFR 260, 261, 262, 264, 265, 266, 267, 268, 270, and 280.

265.13 General Waste Analysis

265.13b

The facility does not follow the procedures specified in the waste analysis plan. For example, in Area #769 some containers were not sealed, and unknown wastes were not protected from possible ignition or reaction by keeping them away from all sources of heat or other possibly incompatible wastes.

265.15 General Inspection Requirements

265.15b.1, 265.15b.2, 265.15b.3 and 265.15b.4

The facility does not have a written inspection schedule.

265.15c

The facility has not taken remedial action to correct the problems revealed on an inspection (the FS smoke drums in Area #772 are still stored on the ground, not protected from rain and sun exposure). Please refer to photograph #2 in Attachment D.

265.15d

The inspection logs do not include the name of the inspector.

265.17 General Requirements for ignitable, reactive or incompatible wastes

265.17b or 265.177c

The storage of ignitable, reactive and incompatible waste is not conducted so that it does not generate extreme heat or pressure, fire or explosion, violent reaction or damage structural integrity of hazardous waste containment devices or threaten human health or the environment. Many drums were stored outside the permitted hazardous waste storage areas, especially the FS smoke drums in Area #772.

265.31 Maintenance and operation of facility

Some of the storage areas (e.g., Area #772), are not operated to minimize the possibility of fire, explosion, or releases of hazardous wastes or hazardous wastes constituent to air, soil, or surface water which could threaten human health or the environment.

265.51, 265.32c, d and 265.33 Required equipment and purpose and implementation of contingency plan

There was no spill control or decontamination equipment at some of the storage facilities. Portable fire extinguishers or other fire control equipment were not available where needed.

265.52 Content of Contingency Plan

265.52d

The contingency plan does not list names, addresses, and phone numbers (office and homes) of all persons qualified to act as emergency coordinators (Please see Attachment I).

265.53 Copies of Contingency Plan

265.53b

The plan has not yet been submitted to all local emergency organizations.

265.54 Amendment of Contingency Plan

265.54

The plan has not yet been reviewed and amended.

265.73 Operating Record

265.73b.1

The operating record does not contain a description of and the quantity of each waste received.

265.73b.2

The operating record does not contain the location of each waste within the facility and the quantity at each location.

265.73b.9

The operating record does not contain an annual certification that there is a program in place to reduce the volume and toxicity of the hazardous wastes generated and that the proposed method of treatment storage or disposal is the practicable method currently available which minimizes the present and future threat to human health and the environment.

265.74 Availability, retention, and disposition of records

265.74a

The Inspection Schedule was not available for inspection.

265.75 Biennial Report

A draft annual report for the year 1986 has not been submitted yet to the DHS. This report is not on EPA form 8700-13B. The report lacks the required certification (see Attachment J).

265.112 Closure Plan; amendment of plan

265.112a.3

The sampling and analytical methods for determining whether soil contamination or decontamination residues are hazardous waste are not included in the decontamination procedures (please see Attachment K).

265.171 Condition of containers

The facility does not transfer hazardous waste from containers not in good condition or leaking containers to containers in good condition (see photograph #4 in Attachment D).

265.173 Management of containers

265.173a

Some containers had open lids (see photograph #10 in Attachment D).

265.173b

Some containers are not managed to prevent rupture or leakage. They are not stored within the limits of the permitted accumulation points (see photograph #6 in Attachment D).

265.177 Accumulation time and 262.34 Special requirements for incompatible wastes

265.177c and 262.34b and 270.71

A potential violation exists if wastes other than those identified in the Part A application are stored in excess of 90 days. Since approximately 70% of the hazardous drums stored at the accumulation points did not have an identification label nor

accumulation date (see photograph #1 in Attachment D), it was not possible to verify whether:

- The facility does not store (e.g. more than 90 days) hazardous wastes not specified in Part A application.
- Incompatible waste were properly segregated.

268.7 Land Disposal Restrictions

The waste analysis plan does not include the special requirements needed for F-solvent wastes (F001-F005).

270 Part A/Part B Application Permit

Area #445, Area #673T3 and the fenced area next to Storage Area #772, currently in use, are not permitted hazardous waste storage areas according to the DHS approved Operation Plan (e.g. Part B Application). The facility Part B Permit describes the storage facility as consisting of "six drum storage areas measuring approximately 600 square feet in total and stores a maximum of one hundred and twenty 55-gallon drums."

270.71a1 and 270.71a3 Operation during interim status

The facility stores a hazardous waste (F001) which is not listed in Part A of the permit application. The facility exceeded the design capacity specified in the Hazardous Waste Facility Permit.

270.72(b) Changes during interim status

The facility did not apply for an increase in the design capacity.

ATTACHMENT A

**EPA FORM A - INTERIM STATUS STANDARDS FOR FACILITIES
THAT TREAT, STORE OR DISPOSE OF HAZARDOUS WASTES**

Inspection Report
U.S. Environmental Protection Agency
Region 9
Toxics and Waste Management Division
Field Operations Branch

Purpose:

Facility Name: MCAS - EL TORO

Street:

City:

State:

Zip Code:

EPA ID number:

Report Number:

Date of Investigation:

EPA Inspector(s):

State Inspector(s):

Facility Representative(s): Beverly Van Cleef

Report Prepared By: Jose Fernandez

II. Interim Status:
(Part 270 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Qualifying For Interim Status:			
1. For the existing facility to be treated as having been issued a permit, the facility must have:			
a. Submitted a notification of H.W. activity (270.70a.1)?	___	___	Part B permit has been issued but the facility is under interim status until California is fully authorized.
b. Submitted Part A of the permit application (270.70a.2)?	___	___	"
c. Achieved compliance with RCRA interim status standards (270.70b)?	___	___	"
(B) Operating During Interim Status:			
1. Has the facility complied with the following restrictions:			
a. Has only treated, stored or disposed of H.W. specified in the Part A (270.71a.1)?	___	___	"
b. Has only employed processes specified in the Part A (270.71a.2)?	___	___	"
c. Has not exceeded design capacities specified in the Part A (270.71a.3)?	___	___	"
(C) Changes During Interim Status:			
1. Has a revised Part A been submitted prior to the following changes:			
a. T/S/D of H.W. not previously identified in the Part A (270.72a)?	___	___	"
b. Increases in design capacity of processes (270.72b)?	___	___	"
c. Changes in or additions to processes (270.72c)?	___	___	"
d. Change in ownership (270.72d)?	___	___	"
e. Have the changes made not amounted to reconstruction (270.72e)?	___	___	"

III. General Facility Standards:
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Required Notices:			
1. Has the RA been notified regarding the receipt of H.W. from a foreign source (265.12a)?	—	—	NA
2. Before transferring ownership, has the facility notified the new owners in writing of the requirements of Parts 265 and 122 (265.12b)?	—	—	NA
(B) General Waste Analysis:			
1. Has the facility obtained a detailed chemical and physical analysis of each H.W. (265.13a.1)?	✓	—	
2. Does the analysis contain all information that must be known to properly treat, store or dispose of the H.W. (265.13a.1)?	✓	—	
3. Does the facility have records documenting the required H.W. analysis, e.g., lab reports, published data, generator supplied data (265.13a.2)?	✓	—	
4. Has the analysis been repeated to ensure that it is accurate and up-to-date (265.13a.3)?	✓	—	
5. Is the analysis repeated when there is a change in the process (265.13a.3)?	—	—	NA
6. For off-site facilities, is the analysis repeated when the H.W. received does not match the H.W. designated on the manifest (265.13a.3)?	—	—	NA
7. For off-site facilities, does the facility inspect or analyze each movement of H.W. to verify that the H.W. received matches the identity of the H.W. specified on the manifest (265.13a.4)?	—	—	NA

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
8. Does the facility have a detailed waste analysis plan (265.13b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
9. Does the facility follow the procedures specified in the waste analysis plan (265.13b)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	H.W. are not always stored in sealed containers Unknown wastes are not kept away from others _____
10. Does the waste analysis plan contain the following elements:			
a. Parameters of analysis of each H.W. handled (265.13b.1)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
b. Rationale for the selection of each parameter (265.13b.2)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
c. Test methods used to obtain a representative sample of H.W. (265.13b.3)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
d. Frequency which each analysis will be repeated (265.13b.4)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
e. For off-site facilities, the analysis that generators have agreed to supply (265.13b.5)?	<input type="checkbox"/>	<input type="checkbox"/>	NA _____
11. For off-site facilities, does the plan specify procedures for inspection or analysis of each movement of H.W. (265.13c)?	<input type="checkbox"/>	<input type="checkbox"/>	NA _____
12. For off-site facilities, does the plan contain the following elements:			
a. Description of procedures used to identify each movement of H.W. (265.13c.1)?	<input type="checkbox"/>	<input type="checkbox"/>	NA _____
b. Description of the sampling method used to obtain a representative sample of the H.W. (265.13c.2)?	<input type="checkbox"/>	<input type="checkbox"/>	NA _____
(C) Security:			
1. Do security measures include:			
a. 24-hour surveillance (265.14b.1)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
b. Artificial or natural barriers and controlled entry (265.14b.2)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
c. Signs with the legend "Danger-Unauthorized Personnel Keep Out" posted at entrances to active portions of facility (265.14c)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
(D) General Inspection Requirements:			
1. Does the facility inspect for equipment malfunctions and deterioration, operator errors, and H.W. discharges (265.15a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
2. Does the facility follow a written inspection schedule (265.15b.1)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
3. Is the schedule kept at this facility (265.15b.2)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
4. Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: (265.15b.3)			
a. monitoring equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<u>NA</u>
b. safety, emergency equipment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
c. security equipment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
d. operating and structural equipment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
5. Does the schedule indicate the frequency of inspection for each item (265.15b.4)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
6. Does the schedule include daily inspections of loading and unloading areas (265.15b.4)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
7. Has the facility taken remedial action to correct the problems revealed on an inspection (265.15c)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	ES smoke drums are still stored on the ground. not protected from sun and rain exposure

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
8. Are inspections recorded in an inspection log (265.15d)?	✓	—	_____
9. Does the log include: (265.15d)			
a. Date and time of inspection?	✓	—	_____
b. Name of inspector?	—	ⓓ	_____
c. Observations recorded?	✓	—	_____
d. Date and nature of repairs or other remedial actions?	✓	—	_____
10. Are inspection records kept for at least 3 years (265.15d)?	—	ⓓ	_____
(E) Personnel Training:			
1. Does the facility have a personnel training program (265.16a.1)?	✓	—	_____
2. Is it directed by a person trained in H.W. management procedures (265.16a.2)?	✓	—	_____
3. Does the program include training in: (265.16a.3)			
a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?	✗	—	NA _____
b. Emergency procedures including contingency plan implementation?	✓	—	_____
4. Do new personnel receive required training within 6 months (265.16b)?	✓	—	_____
5. Do personnel take part in an annual review of the initial training (265.16c)?	✓	—	_____

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
6. Do personnel training records include: (265.16d)			
a. Job titles?	<u>✓</u>	—	_____
b. Job Descriptions?	<u>✓</u>	—	_____
c. Descriptions of training?	<u>✓</u>	—	_____
b. Records of training?	<u>✓</u>	—	_____
(F) Requirements For Ignitable, Reactive, Or Incompatible Wastes:			
1. Are the following precautions taken to prevent accidental ignition or reaction: (265.17a)			
a. Separation and protection from ignition sources?	<u>✓</u>	—	_____
b. No smoking signs in hazard areas?	<u>✓</u>	—	_____
2. Is the T/S/D of ignitable, reactive and incompatible waste conducted so that it does not: (265.17b)			
a. Generate extreme heat or pressure, fire or explosion, or violent reaction?	—	<u>✓</u>	<u>Chlorosulfonic acid storage area has no roof</u>
b. Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?	—	<u>✓</u>	_____ " _____
c. Damage structural integrity of H.W. containment devices? (e.g., tanks, containers, liners)	<u>✓</u>	—	_____
d. Threaten human health or the environment?	—	<u>✓</u>	_____ " _____

IV. Preparedness and Prevention:
(Part 265 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Is the facility designed, constructed, maintained, and operated to minimize the possibility of fire, explosion, or releases of H.W. or H.W. constituents to air, soil, or surface water which could threaten human health or the environment (265.31)?	_____	<input checked="" type="checkbox"/>	<u>Storage areas are not large enough</u>
(B) Required Equipment:			
1. Does the facility have the following equipment where applicable:			
a. Internal communications or alarm systems (265.32a)?	<input checked="" type="checkbox"/>	_____	_____
b. Telephone or 2-way radios at the scene of operation (265.32b)?	<input checked="" type="checkbox"/>	_____	_____
c. Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment (265.32c)?	_____	<input checked="" type="checkbox"/>	_____
d. Water at adequate volume and pressure or foam producing equipment or automatic sprinklers (265.32d)?	_____	<input checked="" type="checkbox"/>	_____
(C) Testing And Maintenance Of Equipment:			
1. Does the facility test and maintain emergency equipment in operable condition (265.33)?			
	_____	<input checked="" type="checkbox"/>	_____
(D) Access To Communications Or Alarm Systems:			
1. Do personnel in areas where H.W. is being handled have immediate access to these systems (265.34)?			
	<input checked="" type="checkbox"/>	_____	_____
(E) Required Aisle Space:			
1. Is their adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency (265.35)?			
	<input checked="" type="checkbox"/>	_____	_____

IV. Preparedness and Prevention: - Continued
 (Part 265 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(F) Arrangements With Local Authorities:			
1. Has the facility made the following arrangements:			
a. Arrangements to familiarize police, fire dept., and emergency response team with H.W. operations (265.37a.1)?	✓	_____	_____
b. Agreements designating primary emergency authority (265.37a.2)?	✓	_____	_____
c. Agreements with State emergency response teams, contractors and equipment suppliers (265.37a.3)?	✓	_____	_____
d. Arrangements to familiarize local hospitals with the properties of H.W. and the types of potential injuries and illnesses from exposure to H.W. (265.37a.4)?	✓	_____	_____
2. Did the facility document in the operating record any refusal by State or local authorities to enter into such arrangements (265.37b)?	_____	_____	NA

V. Contingency Plan and Emergency Procedures:
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Does the facility have a contingency plan (265.51a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
(B) Content Of Contingency Plan:			
1. Does the plan describe actions personnel must take to comply with §§ 265.51 & 265.56 in response to fires, explosions, or unplanned releases of H.W. (265.52a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
2. Does the plan describe arrangements agreed by police, fire dept., hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to § 265.37 (265.52c)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
3. Does the Plan list names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators (265.52d)? (list in order of responsibility)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
4. Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability (265.52e)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
5. Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes (265.52f)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
(C) Copies of Contingency Plan:			
1. Is the plan maintained at the facility (265.53a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
2. Has the plan been submitted to all local emergency organizations (265.53b)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Still in draft phase

V. Contingency Plan and Emergency Procedures: - Con't.
 (Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(D) Amendment Of Contingency Plan:			
1. Has the plan been reviewed and immediately amended when required (265.54)?	—	<u>(V)</u>	_____
(E) Emergency Coordinator:			
1. Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)?	<u>V</u>	—	_____
2. Does the coordinator have authority to carry out the contingency plan (265.55)?	<u>V</u>	—	_____
(F) Emergency Procedures:			
1. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in § 265.56 (265.56)?	—	—	<u>NO</u> _____

VI. Manifest System, Recordkeeping, and Reporting:
(Part 265 Subpart E)

Yes No Comments

(A) Use of Manifest System:

1. Does the facility comply with the following manifest requirements:

a. Sign and date each copy of the manifest (265.71a.1)?

b. Note any significant * discrepancies in the manifest (265.71a.2)?

c. Give transporter one copy of the signed manifest (265.71a.3)?

d. Within 30 days after delivery, send a copy of the manifest to the generator (265.71a.4)?

2. Are records of past shipments retained for 3 years (265.71a.5)?

(B) Manifest Discrepancies:

1. Upon discovering a significant discrepancy, has the facility made an attempt to reconcile the discrepancy with the generator or transporter (265.72b)?

_____ _____ NA

2. For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures (265.72b)?

_____ _____ NA

(C) Operating Record:

1. Does the facility maintain an operating record (265.73a)?

* Significant discrepancies are:

1. For bulk waste; variations > 10% in weight
2. For containerized waste; variations > one drum
3. Obvious differences such as waste solvent substituted for waste acid

VI. Manifest System, Recordkeeping, and Reporting: - Con't
(Part 265 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
2. Does the operating record contain the following information:			
a. A description and the quantity of each waste received (265.73b.1)?	—	✓	<u>Many unidentified drums</u>
b. The method(s) and date(s) of its treatment, storage or disposal as required by Appendix I (265.73b.1)?	—	✓	_____
c. The location of each waste within the facility and the quantity at each location (265.73b.2)? (This information must include cross-references to specific manifest numbers.)	✓	✓	_____
d. For disposal facilities, the location and quantity of each waste is recorded on a map or diagram of each cell or disposal area (265.73b.2)?	—	—	<u>NA</u>
e. Records and results of all waste analysis and trial tests (265.73b.3)?	✓	—	_____
f. Reports detailing all incidents that required implementation of the contingency plan (265.73b.4)?	—	—	<u>NA</u>
g. Records and results of operator inspections (265.73b.5)?	✓	—	_____
h. Monitoring data (265.73b.6)?	—	—	<u>NA</u>
i. All closure and post-closure costs as applicable (265.73b.7)?	—	—	<u>NA</u>
(D) Availability, Retention, Disposition Of Records:			
1. Are all records including plans available for inspection (265.74a)?	✓	✓	_____
2. Have copies of records of H.W. disposal locations and quantities under § 265.73b.2 been submitted to the RA and local land authority upon closure of the facility (265.74c)?	—	—	<u>Inspection schedule is not available</u> <u>NA</u>

VI. Manifest System, Recordkeeping, and Reporting: - Con't.
 (Part 265 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(E) Biennial Report:			
1. Has the facility submitted a biennial report to the RA by March 1 of each even numbered year (265.75)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1986 Annual report only 1985 Biennial report
2. Was the report submitted on EPA form 8700-13B and cover facility activities during the previous calendar year (265.75)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. Does the report include the following information: (265.75)			
a. EPA identification number, name and address of the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Calendar year covered by report?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. For off-site facilities, the EPA identification number of each generator?	<input type="checkbox"/>	<input type="checkbox"/>	NA
d. Description and quantity of each H.W. received and, for off-site facilities, the EPA identification number of each generator listed with this information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
e. Methods of treatment, storage, or disposal for each H.W.?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
f. Monitoring data under § 265.94a.2.ii and iii and b.2 ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NA
g. Most recent closure and post-closure cost estimates?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
h. Required certification?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

VI. Manifest System, Recordkeeping, and Reporting: - Con't
 (Part 265 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(F) Unmanifested Waste Report:			
1. For a facility that has accepted a H.W. from an off-site source without an accompanying manifest, was a report containing the required information submitted to the RA within 15 days after receiving the H.W. (265.76a-g)?	___	___	<u>NA</u>
(G) Additional Reports:			
1. Has the facility reported to the RA: (265.77)			
a. Releases, fires and explosions?	___	___	<u>NA</u>
b. Ground-water contamination and monitoring data?	___	___	<u>NA</u>
c. Facility closure?	___	___	<u>NA</u>

VIII. Closure and Post-Closure:
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Closure Plan:			
1. Does the facility have a closure plan (265.112a)?	<u>✓</u>	_____	_____
2. Does the plan identify the steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close at the end of its intended operating life (265.112a)?	<u>✓</u>	_____	_____
3. Do the steps to close in the plan include: (265.112a)			
a. Pre-treatment of H.W.?	<u>✓</u>	_____	_____
b. Treatment of H.W.?	<u>✓</u>	_____	_____
c. Removal of H.W. from process units?	<u>✓</u>	_____	_____
d. Disposal of H.W.?	<u>✓</u>	_____	_____
e. Decontamination of equipment and structures?	<u>✓</u>	_____	_____
f. Scheduled inspections for closure certification purposes?	<u>✓</u>	_____	_____
4. Does the description of how and when the facility will be closed include the following elements:			
a. Maximum extent of operation which will be unclosed during the life of the facility (265.112a.1)?	<u>✓</u>	_____	_____
For facilities that have designated H.W. management areas inactive prior to Nov. 19, 1980, are records available documenting the cessation of activity or final closure?	_____	_____	<u>NA</u>
Was a Notification of Hazardous Waste Site submitted to EPA as required by § 103c of CERCLA ?	<u>✓</u>	_____	_____

VIII. Closure and Post-Closure: - Continued
 (Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
e. Estimate of the expected year of closure (265.112a.4)?	—	<u>✓</u>	_____
f. Schedule for final closure activities (265.112a.4)?	<u>✓</u>	—	_____
g. Does the schedule include:			
Total time required to close?	<u>✓</u>	—	_____
Time required for intervening closure activities? (e.g., Time required for H.W. treatment, disposal, decontamination, and certification inspections.)	<u>✓</u>	—	_____
4. Has the facility amended the plan whenever changes in operating practice or process design affect the plan or there is a change in the expected year of closure (265.112b)? (Plan must be amended within 60 days of the changes.)	—	—	<u>NA</u> _____
5. Has the facility submitted a closure plan to the RA at least 180 days before the date they expect to begin closure (265.112c)?	—	—	<u>NA</u> _____
(B) Time Allowed For Closure:			
1. Does the schedule for final closure allow for the following:			
a. Treatment, removal, or disposal of H.W. within 90 days after receipt of final volume of H.W. or after approval of closure plan (265.113a)?	<u>✓</u>	—	_____
b. Completion of closure plan activities within 180 days after receipt of final volume of H.W. or after approval of closure plan (265.113b)?	<u>✓</u>	—	_____

VIII. Closure and Post-Closure: - Continued
 (Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(C) Disposal And Decontamination Of Equipment:			
1. For facilities that have completed closure activities, has all equipment and structures been properly disposed of or decontaminated by removing all H.W. and contaminated residues (265.114)?	_____	_____	<u>NA</u>
(D) Certification Of Closure:			
1. For facilities that have completed closure activities, has a certification by owner/operator and an independent registered professional engineer been submitted to the RA (265.115)?	_____	_____	<u>NA</u>
(E) Partial Closure:			
1. Does the facility plan to close discreet regulated H.W. management units during the intended operating life?	_____	_____	<u>NA</u>
If "Yes" complete compliance form for partial closure.			

VIII. Closure and Post-Closure: - Continued
 (Part 265 Subpart G)

Compliance Form For Partial Closure

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(E) Partial Closure:			
1. Does the closure plan describe how the facility will be partially closed (265.112a.1)?	---	---	NA
2. Does the plan describe the size of areas partially closed?	---	---	
3. Does the plan describe the procedures for partial closure?	---	---	
4. Does the plan address maintenance activities, including: (265.112a.1)	---	---	
a. Visual inspections?	---	---	
b. Ground-water monitoring?	---	---	
c. Maintaining cover?	---	---	
d. Maintaining diversion structures?	---	---	
e. Controlling erosion?	---	---	
f. Maintaining vegetation?	---	---	
g. Maintaining site security systems?	---	---	
h. Leachate collection system?	---	---	
i. Gas collection system?	---	---	
j. Other (specify)?	---	---	
5. Does the plan describe the frequencies for each type of maintenance activity (265.112a.1)?	---	---	
6. Does the plan describe when the facility will be partially closed (265.112a.1)?	---	---	
7. Does the schedule for partial closure include: (265.112a.1)			
a. Date(s) of partial closure(s)?	---	---	
b. Total time required for each partial closure?	---	---	
c. Time required for intervening partial closure activities? (e.g., time required for waste removal, stabilization, treatment, disposal; placement of cover; vegetation; decontamination; certification.)	---	---	

VIII. Closure and Post-Closure: - Continued
 (Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(F) Post-Closure:			
1. Does the facility have a post-closure plan (265.118a)?	---	---	NA
2. Does the plan cover the maximum area expected to contain H.W. after closure, including: (265.118a)			
a. Landfills?	---	---	
b. Disposal surface impoundments?	---	---	
c. Land treatment facilities where H.W. will remain?	---	---	
d. Other remaining H.W. (specify)?	---	---	
3. Does the plan cover all areas where H.W. will remain that were active as of Nov. 19, 1980 (265.118a)?	---	---	
4. Does the plan provide for 30 years of post-closure care (265.117a)?	---	---	
5. Does the plan clearly identify the activities required in post-closure care (265.118a)?	---	---	
6. Does the plan clearly identify the frequencies for post-closure care activities (265.118a)?	---	---	
7. Does the plan describe ground-water monitoring, including: (265.118a.1)			
a. Number of wells?	---	---	
b. Sample collection activities and frequencies?	---	---	
c. Sample testing procedures and frequencies?	---	---	
d. Replacement of failed wells?	---	---	

VIII. Closure and Post-Closure: - Continued
 (Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
8. Does the plan describe maintenance for waste containment structures, including the types of activities and frequency of activities necessary to maintain: (265.118a.2)			
a. Site security systems?	---	---	NA
b. Surveyed benchmarks?	---	---	
c. Facility monitoring systems?	---	---	
d. Final cover (erosion damage repair)?	---	---	
e. Vegetation (fertilizing and mowing)?	---	---	
f. Runoff collection and treatment systems?	---	---	
g. Runon control systems?	---	---	
h. Leachate collection, removal and treatment systems?	---	---	
i. Gas collection and treatment systems?	---	---	
j. Other (specify)?	---	---	
9. Does the plan identify the name, address and phone number of the post-closure period contact (265.118a.3)?	---	---	
10. Did the facility amend the plan whenever changes in operating practices, or process design, or events which occur during the active life of the facility, affect their post-closure plan (265.118b)? (Plan must be amended within 60 days after the changes or events occur.)	---	---	
11. Did the facility submit their post-closure plan to the RA at least 180 days before they expect to begin closure (265.118c)?	---	---	
12. Did the facility amend the plan whenever changes in monitoring or maintenance plans or events which occur during the post-closure care period affect their post-closure plan (265.118e)? (Facility must petition RA to amend plan in accordance with procedures specified in § 265.118f.)	---	---	

VIII. Closure and Post-Closure: - Continued
 (Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(G) Notice To Local Land Authority:			
1. For disposal facilities, were the following documents submitted to the RA and local land authority within 90 days after closure was completed: (265.119)			
a. A survey plat indicating the locations and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks?	---	---	NA
b. A record of the type, location, and quantity of H.W. disposed of within each cell or area of the facility?	---	---	
c. A record of the type, location, and quantity of the wastes disposed of before Nov. 19, 1980?	---	---	
(H) Notice In Deed To Property:			
1. For disposal facilities, did the owner of the property record in the deed a notation that will in perpetuity notify any potential purchaser of the property that the land was used to manage H.W. and its use is restricted under § 265.117c (265.120)?			
	---	---	

X. Use And Management Of Containers:
(Part 265 Subpart I)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition (265.171)?	—	✓	_____
2. Are containers compatible with H.W. stored in them (265.172)?	✓	—	_____
3. Are containers stored closed (265.173a)?	—	✓	<i>Few open lids</i>
4. Are containers managed to prevent rupture or leakage (265.173b)?	—	✓	_____
5. Are containers inspected weekly for leaks and deterioration (265.174)?	✓	—	_____
6. Are ignitable or reactive wastes stored at least 50 feet from the facility's property line (265.176)?	✓	—	_____
7. Are incompatible wastes stored in separate containers (265.177a)?	✓	—	_____
8. Are H.W. not placed in unwashed containers that previously held an incompatible waste or material (265.177b)?	✓	—	_____
9. Are containers holding a H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device (265.177c)?	—	?	<i>unknown (lack of labelling)</i>
10. Are containers that are not empty managed as a H.W. (261.7a.2)?	✓	—	_____
11. For a container to be considered empty the facility must ensure that:			
a. No more than one inch of residue remains on bottom of container or inner lining (261.7b.1)?	✓	—	_____
b. Containers that held an acutely H.W. are tripled rinsed using a solvent capable of removing the contents (261.7b.3)?	✓	—	_____

XI. Tanks:
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Is the treatment or storage of H.W. in tanks conducted so that it does not: (265.192a)			
a. Generate extreme heat or pressure; fire or explosion; or violent reaction?	---	---	NA
b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?	---	---	
c. Damage the structural integrity of the tank?	---	---	
2. Are H.W. or treatment reagents placed in a tank so that they do not cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail (265.192b)?	---	---	
3. Do uncovered tanks have at least 2 feet of freeboard, or dikes, or other containment features (265.192c)?	---	---	
4. Where H.W. is continuously fed into a tank, is the tank equipped with a waste feed cutoff system or by-pass system to a stand-by tank (265.192d)?	---	---	
5. Does the facility conduct waste analysis and trial treatment or storage tests, or have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions before the tank is used to:			
a. Chemically treat or store a H.W. which is substantially different from waste previously treated or stored in the tank (265.193a.1)?	---	---	
b. Chemically treat H.W. with a substantially different process than was previously used (265.193a.2)?	---	---	

XI. Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
6. Are daily and weekly inspections done for the following:			
a. Discharge control equipment e.g., feed cutoff, bypass and drainage systems (Daily) (265.194a.1)?	—	—	NA
b. Data gathered from monitoring equipment e.g., pressure and temperature gauges (Daily) (265.194a.2)?	—	—	
c. Level of waste in uncovered tanks (Daily) (265.194a.3)?	—	—	
d. Construction materials of tank e.g., corrosion, leaking fixtures or seams (Weekly) (265.194a.4)?	—	—	
e. Discharge confinement structures e.g., dikes (Weekly) (265.194a.5)?	—	—	
7. At closure, are all H.W. and residues removed from tanks and associated equipment and structures (265.197)?	—	—	
8. Are ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity (265.198a.1)? or	—	—	
9. Are ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react (265.198a.2)?	—	—	
10. Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981) (265.198b)?	—	—	
11. Are incompatible wastes stored in separate tanks (265.199a)?	—	—	
12. Are H.W. not placed in unwashed tanks that previously held an incompatible waste or material (265.199b)?	—	—	

XIII. Waste Piles:
(Part 265 Subpart L)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Are waste piles covered or protected from dispersal by wind (265.251)?	—	—	NA
2. Is a representative sample of waste from each incoming movement analyzed to determine its compatibility with other waste in the pile (265.252)?	—	—	
3. For waste piles where the leachate or run-off from the pile is a H.W.:			
a. Is the pile placed on an impermeable base that is compatible with the waste; run-on is diverted away from the pile; leachate and run-off is collected and managed as a H.W. (265.253a)? -or-	—	—	
b. The pile is protected from precipitation and run-on (265.253b.1)? -and-	—	—	
c. No liquids or wastes containing free liquids are placed in the pile (265.253b.2)?	—	—	
4. For facilities that add ignitable or reactive wastes to an existing pile, can the following be demonstrated:			
a. The resulting waste mixture no longer meets the definition of ignitable or reactive waste and the mixing will not cause an uncontrolled reaction (265.256a.1)?	—	—	
b. The waste is protected from materials or conditions that might cause them to ignite or react (265.256a.2)?	—	—	
5. Does the facility take precautions to ensure that incompatible wastes and materials are not placed in the same waste pile (265.257a)?	—	—	
6. Are piles of H.W. that are incompatible with materials stored nearby separated by sufficient distance or protected by some structural device e.g., dike, wall or berm (265.257b)?	—	—	
7. Are H.W. not placed on the same area where incompatible wastes were previously piled (265.257c)?	—	—	

ATTACHMENT B

**RCRA F-SOLVENTS
TSD REQUIREMENTS CHECKLIST**

DRAFT
RCRA F-SOLVENT LAND RESTRICTION

Inspector Name

Address

Tel. No.

TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

A. Facility Name Thrine Corps Air Station - El Toro B. Street (or other identifier)
C. City San Juan Ana D. State CA E. Zip Code 92709 F. County Name

G. Nature of business; identification of operations

H. EPA ID #

CA 6170023208

I. Facility Contact (Name and Phone Number)

Comments

II.A. For on-site facilities, complete the generator checklist

B. General Facility Standards

1. Was waste analysis plan revised properly to cover Part 268 requirements [§264.13 or 265.13]? Yes X No
2. Did facility obtain representative chemical and physical analysis of waste(s) and residues? X Yes No
 - a. Did testing include analyses for all F001-F005 constituents? X Yes No
 - b. Were analyses performed using TCLP? X Yes No
 - c. Were analyses conducted onsite or offsite (identify offsite lab)? X On Off: _____
 - d. Describe frequency of sampling: As necessary" (e.g. when the generating process changes)"
 - e. Describe procedures used to identify manifest discrepancies NA
3. Are the waste analysis plans acceptable [§264.13/265.13]? Yes X No should be improved and updated to cover part 268.
4. Are the operating records, including analyses and quantities, complete [§264.73/265.73]? Yes X No

Facility: _____
 ID Number: _____
 Inspector: _____
 Date: _____
Comments

B. Storage (§268.50)

1. a. Were F001-F005 wastes exceeding treatment standards stored?

Yes No *Unknown because of lack of labeling*

If no, go to "C"

b. Are all containers and tanks clearly marked to identify contents and date(s) entering storage?

Yes No

c. Do operating records track the location, quantity and dates wastes exceeding treatment standards entered and were removed from storage?

Yes No

d. Do operating records agree with container/tank labeling?

Yes No

e. Is waste exceeding treatment standards stored for less than 1 year?

Yes No

If yes, can you show that such accumulation is not necessary to facilitate proper recovery treatment or disposal?

Yes No

If yes, state how: _____

f. Were tanks emptied and containers sent for treatment at least once per year, and do operating records show that the volume of waste removed from tanks annually at least equals tank volume?

Yes No

g. Was/is waste exceeding treatment standards stored for more than one year?

Yes No

Facility: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

If yes, state the owner/operators' proof that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____

h. Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments? Yes No

C. Treatment in Surface Impoundments (§268.4)

1. Were F001-F005 wastes exceeding treatment standards placed in surface impoundments for treatment? Yes No

NA

If no, go to "D"

2. Does the facility have acceptable evidence that treatment occurs in the impoundment? Yes No
If yes, note the evidence _____

3. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably and in accordance with the sampling frequency and analysis specified in the waste analysis plan, and are the results in the operating record? Yes No

4. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards specified in §268.41? Yes No

5. Provide the frequency of analyses conducted on treatment residues: _____

6. Have the hazardous waste residues that exceed the treatment standards (§268.41) been removed adequately, and on an annual basis? Yes No DNA

Comments

Facility: _____
ID Number: _____
Inspector: _____
Date: _____

(a) If answer to 6 is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? Yes No

7. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? Yes No

8. When removed, were solvent wastes managed subsequently in another surface impoundment? Yes No

9. When removed, were wastes treated prior to disposal? Yes No

(a) If yes, are waste residues treated on-site or off-site: Onsite Offsite

(b) Identify management method: _____

10. Is the information on Nos. 3-9 above adequately documented in the waste analysis plan and operating record? Yes No

11. Have the minimum technology requirements(§264.221 or 265.221) been met? Yes No

If the minimum technology requirements have not been met, has a waiver (268.4(a)(3)) been granted for that unit(s)? Yes No

12. Have the Subpart F ground-water monitoring requirements been met? Yes No

13. Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements, and the waste analysis plan to the Agency? Yes No

Comments

Facility: _____
ID Number: _____
Inspector: _____
Date: _____

D. Treatment

1. Did the facility operate treatment facilities for F-solvent waste (not including surface impoundments)?

___ Yes ___ No

NA

If no, go to "E"

2. Describe the treatment processes for F-solvent wastes: _____

3. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the F-solvent wastes are less than treatment standards [§268.7(b)]?

___ Yes ___ No

4. Describe frequency of testing of treatment residuals. _____

5. Was dilution used as a substitute for treatment?

___ Yes ___ No

6. Are certifications and results of waste analyses kept in the operating record? ___ Yes ___ No

7. Are notices with waste number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment stating that waste has been treated to treatment performance standards [§268.7(b)]?

___ Yes ___ No

8. Are certifications submitted for each shipment [§268.7(b)]?

___ Yes ___ No

Facility _____
ID Number _____
Inspector _____
Date _____

E. Land Disposal

1. Were F-solvent wastes placed in land disposal units (landfills, surface impoundments [for this question, do not include if in "C"] waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vault or bunker? Yes No

NA

2. Did facility have the notice and certification from generators in its operating record [§§268.7(c); 268.7(a),(b)]? Yes No

3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [§268.7(c)] Yes No

If yes, at what frequency? _____

4. Were F-solvent wastes exceeding the treatment standards placed in land disposal units [268.30] (excluding national capacity variances [268.30(a)]) Yes No

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case capacity extension [268.5] or variance [268.44] Yes No

5. Were F-solvent wastes subject to a national or case-by case capacity variance/extension disposed? Yes No

a. If yes, were these wastes disposed in a facility that has a new, replacement, or laterally expanded landfill or impoundment? Yes No

If (a) is yes, have the minimum technology requirements been met for all such units at the facility? Yes No

If (a) is yes, has the minimum technology requirements inspection been performed? Yes No

Facility _____
ID Number _____
Inspector _____
Date _____

Comments

6. Were adequate records of disposal maintained? Yes No
7. If wastes subject to a nationwide variances, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have notices [268.7(a)(3)] and records of disposal? Yes No
8. What is the volume of F-solvent waste disposed to date (by waste)? _____
9. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? Yes No

ATTACHMENT C

HSWA REQUIREMENTS CHECKLIST

HSWA Requirements

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
<u>Underground Tanks</u>			
1. If an underground product storage tank has been installed since May 7, 1985, does it comply with the following standards:			
a. Will it prevent releases due to corrosion or structural failure for the operational life of the tank (280.2(a)(1))?	_____	_____	NA _____
b. Is it cathodically protected against corrosion, constructed of non-corrosive material, or designed in a manner to prevent the release or threatened release of any stored substance (280.2(a)(2))?	_____	_____	_____
c. Is it constructed or lined with material that is compatible with the substance to be stored (280.2(a)(3))?	_____	_____	_____
2. Did the facility notify the State (or EPA if on Indian lands) by May 8, 1986, of any tank(s) in the ground as of January 1, 1974 (280.3)?	✓ _____	_____	_____

HSWA Requirements

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
<u>Part 266, Subparts D and E</u>			
<u>Prohibitions</u>			
1. Are mixtures of hazardous waste and used oil used for dust suppression (266.23)?	_____	_____/_____ ✓	_____
2. Is any hazardous waste fuel or off-specification used oil fuel burned in restricted (non-industrial) boilers or furnances (266.31(b) and 266.41(b))?	_____	_____/_____ ✓	_____
3. If the facility is a cement kiln located within the boundaries of a municipality of population greater than 500,000, and is not operating as a RCRA incinerator, are they burning hazardous waste fuel (266.31)?	_____	_____	_____ NA
<u>Notification</u>			
1. Is the facility engaged in any of the following activities with respect to either used oil fuel or hazardous waste fuel 266.34 and 266.43:			
a. marketing?	_____	_____/_____ ✓	_____
b. processing?	_____	_____/_____ ✓	_____
c. burning?	_____	_____/_____ ✓	_____
If not, Part 266, Subparts D & E do not apply.			
2. If so, has the facility notified EPA of those waste-as-fuel activities (in addition to their original notification (266.34(b), 266.35, 266.43(b), and 266.44)?	_____	_____	_____ NA

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
<u>Storage</u> If the facility handles hazardous waste fuel, is it stored in compliance with Part 265 (266.34(c))? (Effective 5/29/86)	_____	_____	NA _____

Recordkeeping

A. Used Oil Fuel (UOF):

1. If the facility is the first marketer to claim that the used oil fuel meets all the specifications listed in 266.40(e), do they have records of the analyses (or other adequate information) to document that claim (266.43(b)(6))? (Lead specification is not effective until 5/29/86)	_____	_____	NA _____
--	-------	-------	-------------

2. Does all off-specification UOF meet the rebuttable presumption of mixing with hazardous waste (1,000 ppm total halogen) (266.40(c))?	_____	_____	NA _____
---	-------	-------	-------------

If not, the fuel is considered a hazardous waste fuel and must be handled as such. (See (B) below)

3. Does the facility have copies of invoices for all off-spec. UOF shipments sent or received (266.43(b)(6) and 266.44(e))? (Effective 3/31/86)	_____	_____	NA _____
---	-------	-------	-------------

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
4. If the facility markets to a burner, or is itself a burner, do they have on record a copy of the burner's certification that they have notified EPA of waste-as-fuel activities and will only burn in unrestricted boilers or furnaces (i.e., industrial boilers and furnaces burning to recover useful heat energy, as specified in 261.41(b)), (266.43(b)(6) and 266.44(e))? (Effective 3/31/86)	_____	_____	_____ NA
B. Hazardous Waste Fuel (HWF):			
1. Does the facility have records of manifests for all shipments of hazardous waste fuel sent out or received (262.40, 264.71(a), and 265.71(a))? (Effective 3/31/86)	_____	_____	_____ NA
2. If the facility markets to a burner or is itself a burner, is there, on record, a copy of the burner's certification that they have notified EPA of waste-as-fuel activities and will only burn in unrestricted boilers and furnaces (i.e., industrial boilers and furnances burning to recover useful energy, as specified in 266.31(b)), (266.34(f) and 266.35(e))?	_____	_____	_____ NA

HSWA Requirements

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
<u>Part 262</u>			
1. If the facility generates between 100 and 1,000 kg/month, are all shipments off-site accompanied by a manifest (261.5)?	_____	_____	NA
2. Does the generator sign the waste minimization certification on the manifest (Part 262, Appendix)?	_____	<input checked="" type="checkbox"/>	The HW manifest forms used does not have a waste minimization section
3. Did the facility submit the required annual report on exports (due 3/1 each year) (262.50(d))?	<input checked="" type="checkbox"/>	_____	_____
4. Does the operating record contain an annual certification by the permittee that:			
a. There is, to the extent economically practicable, a program in place to reduce the volume and toxicity of the hazardous waste that generates? <u>and</u>	_____	<input checked="" type="checkbox"/>	_____
b. The proposed method of treatment, storage, or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment (264.73(b)(9))?	_____	<input checked="" type="checkbox"/>	_____

HSWA Requirements

Corrective Action Program Development

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
1. Does the facility have SWMU's? Assign each yes response a consecutive number. Describe unit in comments section.			
1. Landfill	_____	✓	_____
2. Surface Impoundment	_____	✓	_____
3. Land Farm	_____	✓	_____
4. Waste Pile	_____	✓	_____
5. Incinerator	_____	✓	_____
6. Storage Tank (above ground)	✓ ₁	_____	_____
7. Storage Tank (below ground)	✓ ₂	_____	_____
8. Container Storage Area	✓ ₃	_____	Total of nine container storage area
9. Injection Wells	_____	✓	_____
10. Wastewater Treatment Units	_____	✓	_____
11. Transfer Stations	_____	✓	_____
12. Loading/Unloading Areas	_____	✓	_____
13. Waste Recycling Operations	_____	✓	_____
14. Waste Treatment Units	_____	✓	_____
15. Waste Detoxification Units	_____	✓	_____
16. Others	_____	✓	_____

2. Is there any indication of a possible release?
(seeps, discolored soil, stressed vegetation, etc)

1. SWMU 1	_____	✓	_____
2. SWMU 2	_____	✓	_____
3. SWMU 3	✓	_____	Container soil was removed
4. SWMU 4	_____	_____	_____
5. SWMU 5	_____	_____	_____
6. SWMU 6	_____	_____	_____
7. SWMU 7	_____	_____	_____

3. Have any monitoring, sampling, closure activities or mitigation efforts occurred at any of the SWMU's?
Attach copies of reports and data.

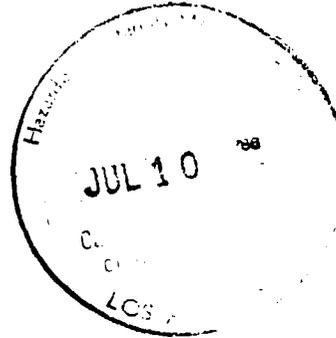
1. SWMU 1	_____	✓	_____
2. SWMU 2	_____	✓	_____
3. SWMU 3	_____	✓	_____
4. SWMU 4	_____	_____	_____
5. SWMU 5	_____	_____	_____
6. SWMU 6	_____	_____	_____
7. SWMU 7	_____	_____	_____

ATTACHMENT D

**HAZARDOUS WASTES FACILITY PERMIT
AND PERMIT CONDITIONS**

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
SACRAMENTO, CA 95814



Facility:)	<u>HAZARDOUS WASTE FACILITY PERMIT</u>
)	
United States Marine Corps)	EPA ID Number: CA 6170023208
Air Station (Helicopter))	
El Toro, California 92709)	Effective Date: JUNE 30, 1986
)	
Operator:)	Expiration Date: JUNE 30, 1991
)	
United States Marine Corps)	
Air Station (Helicopter))	
El Toro, California 92709)	
)	

Pursuant to Section 25200 of the California Health and Safety Code, this Hazardous Waste Facility Permit is hereby issued to the United States Marine Corps Air Station-El Toro. The issuing of this permit is subject to the conditions set forth in Attachment A which consists of 26 pages.

C. David Willis
C. David Willis
Deputy Director
Toxic Substances Control Division

6/30/86
Date

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ATTACHMENT A

Hazardous Waste Facility Permit

United States Marine Corps
Air Station (Helicopter)
El Toro, California 92709
EPA ID No. CA 6170023208

I. DESCRIPTION OF FACILITY

A. Ownership, Operations, and Location

United States Marine Corps, Air Station (helicopter), hereafter called the "operator" and/or "owner" has applied to the California State Department of Health Services for a permit authorizing continued operation of an existing hazardous waste storage facility located in El Toro, California. The facility operation involves storage of on-site generated hazardous wastes.

The processes involved in the facility that produces hazardous wastes are aircraft and vehicle maintenance, degreasing, dry cleaning and painting. The hazardous wastes which are stored in the facility consists of 330 gallons per year of spent solvent, 1,900 gallons per year of dry cleaning solution, 330 gallons per year of paint waste, 48,000 gallons per year of lube oil, 26,000 gallons per year of hydraulic oil, 360 batteries per year and 36 pounds per year of lithium batteries, and 246,000 gallons per year of jet fuel, 360 gallons per year of transmission fluid, 2,200 gallons per year of diesel fuel, 1,254 gallons per year of various solvents, 2,000 oily rags per year, 1,200 pounds per year of calcium hypochlorite, 120 pounds per year of asbestos, 660 gallons per year contaminated water, small quantity of a few other chemicals due to occasional discovery in various stores in the facility and 200 gallons of PCB in transformers.

The hazardous wastes are stored in approved drums and underground tanks within protected areas prior to their transportation to a permitted treatment, storage or disposal facility. The storage facility consists of six drum storage areas measuring approximately 600 square feet in total and stores a maximum of 120 55-gallon drums. The California State Department of Health Services has jurisdiction over these hazardous waste management facilities and is issuing this permit subject to the terms and conditions contained herein.

B. Compliance with the California Environmental Quality Act (CEQA)

The California State Department of Health Services, Toxic Substances Control Division, is issuing this Hazardous Waste Facility Permit for the continued operation of an existing facility with only minor alter-

rations, and as such is exempt from the provisions of the California Environmental Quality Act in accordance with Section 15301, Chapter 3, Title 14, California Administrative Code.

II. GENERAL CONDITIONS

A. References and Terminology

All parts in this permit are identified by Roman numerals. The items set forth in each part shall apply to the owner, operators, and/or facility in addition to the items set forth in any preceding and/or following part of this permit. Unless explicitly stated otherwise, all cross-reference to items in this permit shall refer only to items occurring within the same part.

B. Effect of Permit

The owner or operator is permitted to store hazardous wastes in accordance with the conditions of this permit. Any storage of hazardous wastes not authorized in this permit is prohibited. Compliance with this permit constitutes compliance for purposes of enforcement with the provisions of the California Health and Safety (H&S) Code, in regards to the facility permit requirements including Chapters 6.5 and 6.7, Division 20, and with the Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes (Chapter 30, Division 4, Title 22, CAC). Issuance of this permit does not convey property rights of any sort or any exclusive privilege, nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of federal, state, or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment for any imminent and substantial endangerment to human health or the environment.

C. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause as specified in Sections 66382, 66383, and 66385, Title 22, California Administrative Code (CAC). A new facility permit condition or a modification of an existing facility permit condition shall become effective on the date that written notice of such change is received by the owner or operator. The filing of a request for a permit modification, revocation and reissuance, or termination or the modification of planned changes or anticipated noncompliance on any part of the owner or operator does not stay the applicability or enforceability of any permit condition.

D. Need to Halt or Reduce Activity

It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

E. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

F. Operation Plan

1. By the issuance of this permit, this Operation Plan dated February 26, 1986, is hereby approved. This Operation Plan and any subsequent revisions thereof, subject to the approval of the Department, are by this reference made part of this permit. Specific sections of the Operation Plan are referenced elsewhere in this permit.
2. The owner or operator shall operate and maintain the facility in accordance with the Operation Plan.
3. In the event of any conflict between this permit and the Operation Plan referenced herein, the provisions of the permit shall be controlling.
4. The Operation Plan shall be maintained at the facility at all times until closure is completed.

G. General Responsibilities of Operator

1. Compliance

- a. The owner or operator shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit or approved by the Department. Any permit noncompliance constitutes grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application.
- b. The owner or operator shall comply with all laws, regulations, permits, zoning conditions, and all other requirements established by federal, state, and local agencies.

2. Reapplication

If the owner or operator wishes to continue an activity regulated by this permit after the expiration date of this permit, the owner or operator must submit a completed application for a new permit at least 180 days before this permit expires.

3. Permit Expiration

This permit and all conditions therein will remain in effect beyond the permit expiration or termination date if the owner or

operator has submitted a timely, completed application and, through no fault of the owner or operator, the Department has not issued a new permit.

4. Transfer of Permit

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to Sections 66382 (b)(2) or 66385 (d), Title 22, CAC. The owner or operator shall notify the Department of a proposed change in ownership of this facility at least 30 days prior to the date of the transfer. Furthermore, before transferring ownership or operation of the facility during its operating life, the owner or operator shall notify the new owner or operator in writing of the requirements of this permit and the permitting process. A copy of this notification shall be submitted to the Department.

5. Mitigation

The owner or operator shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

6. Operation and Maintenance

- a. The facility shall be maintained at all times and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, surface water, or ground water which could threaten human health or the environment.
- b. All equipment, pipes, and lines used at the facility to handle, transfer, pump, or store hazardous wastes shall be maintained in a manner that prevents the leaking and spilling of hazardous wastes.
- c. The owner or operator shall at all times properly operate and maintain all facilities of treatment and control (and related appurtenances) which are installed or used by the owner or operator to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Submittal of Requested Information

The owner or operator shall furnish to the Department, within a reasonable time, any relevant information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, terminating this permit, or to determine compliance

with this permit. The owner or operator shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

8. Hazardous Waste List

- a. The owner or operator shall maintain a current list of hazardous wastes that can be accepted by the facility. The owner or operator shall as necessary, update the hazardous waste list presented in the approved Operation Plan. Any additions to the list must be approved by the Department prior to their inclusion.
- b. Transfer stations, since they have variable inventories can handle all wastes except those prohibited in III.B.

9. Inspection and Entry

The owner or operator shall allow authorized representatives of the Department, the State Water Resource Control Board and a Regional Water Quality Control Board, or the local health agency, upon the presentation of credentials and other documents as may be required by law to:

- a. Enter at reasonable times upon the owner's or operator's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- d. Sample or monitor, at reasonable times, for the purpose of assuring permit compliance or, as otherwise authorized by law, any substances or parameters at any location.

10. Planned Changes

The owner or operator shall obtain approval from the Department as soon as possible and at least 30 days in advance of any planned physical alterations or additions affecting operation of the hazardous waste area of the permitted facility.

11. Anticipated Noncompliance

The owner or operator shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. The owner/operator shall report to the California Office of Emergency Services (800) 852-7550 any circumstances that may endanger public health or the environment immediately upon becoming aware of the incident.

12. 24-Hour Reporting

The owner or operator shall report to the Department any noncompliance which may endanger health or the environment. Any information shall be provided verbally within 24 hours from the time the owner or operator becomes aware of the noncompliance. The following shall be included as information which must be reported verbally within 24 hours to the Department of Health Services, Toxic Substances Control Division, Southern California Section, 107 South Broadway, Room 7011, Los Angeles, California 90012; telephone number (213) 620-2380.

- a. Information concerning any release of hazardous waste that may cause an endangerment to public drinking water supplies.
- b. Any information of any release or discharge of hazardous waste, or of fire or explosion from the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (1) Name, address, and telephone number of the owner or operator;
 - (2) Name, address, and telephone number of facility;
 - (3) Date, time, and type of incident;
 - (4) Name and quantity of material(s) involved;
 - (5) The extent of injuries, if any;
 - (6) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
 - (7) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within fifteen days of the time the owner or operator becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times), and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

13. Other Noncompliance

The owner or operator shall report all other instances of noncompliance not otherwise required to be reported at the time monitoring or other reports are submitted. The reports shall contain the information listed in item II.G.12 above.

14. Other Information

The owner or operator shall promptly submit all facts or information which have been omitted or which correct information in the permit application or any other report submitted to the Department.

H. Signatory Requirement

All reports or other information requested by the Department shall be signed by the owner or operator. For a corporation, this would be a responsible corporate officer, for a partnership or sole proprietorship, by a general partner or the proprietor, respectively, and for a municipality or other public agency by a principal executive officer or ranking official. The person signing the document shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

I. Certification of Construction

The owner or operator may not commence treatment, storage, or transfer of hazardous wastes at the facility or modified portion of the facility until:

1. The owner or operator has submitted to the Department by certified mail or hand delivery a letter signed by the owner or operator and an appropriate engineer registered in California stating that the facility has been constructed in compliance with the permit; and
2. The Department has inspected the constructed facility and finds it is in compliance with the conditions of the permit; or
2. The Department has either waived the inspection or has not within 15 days notified the owner or operator of its intent to inspect.

J. Waste Minimization Certification

The owner or operator shall retain original signed copies for at least three years from the date of certification of the following statement on waste minimization.

"I hereby certify under penalty of law that personnel under my direction and supervision at this facility are undertaking specific steps in accordance with a program in place to minimize the amount and toxicity of hazardous wastes generated at this facility to a degree economically practicable and that the method utilized for the treatment, storage, or disposal of hazardous wastes is the practicable method currently available to this facility which minimizes the present and future threat to human health and the environment. I am aware that there are significant penalties for false certification, including the possibility of fine and imprisonment for flagrant falsifications."

The owner or operator shall make this certification at least annually and shall retain these copies as part of the facility's written operating record as required in conditions III.N.2.a (8) and III.N.3.a. of this part.

III. SPECIAL CONDITIONS

A. Prohibition of Disposal

Hazardous wastes shall not be permanently disposed of at the facility unless such disposal is properly permitted.

B. Wastes Prohibited

Hazardous wastes described below shall not be handled at the facility:

1. Extremely hazardous wastes as defined in Sections 66720 and 66723, Title 22, CAC, unless specifically approved by the Department;
2. Forbidden and Class A explosives as defined in Sections 173.51 and 173.53, Title 49, CFR;
3. Any hazardous waste not listed in the approved Operation Plan or otherwise approved by the Department; and
4. Any hazardous waste generated outside the premises of the facility.

C. Storage Conditions

1. Storage in Containers

- a. Containers holding hazardous wastes shall be stored only in the area designated in the approved Operation Plan.
- b. A container holding hazardous waste shall remain closed during storage, except when it is necessary to add or remove waste.
- c. A container holding hazardous waste shall not be handled, or stored in a manner which might rupture the container or cause it to leak.

- d. A label shall be maintained on all containers in which hazardous wastes are stored. Labels shall include the following information:
- (1) Composition and physical state of the waste;
 - (2) Special safety recommendations and precautions for handling the waste;
 - (3) Statement or statements which call attention to the particular hazardous properties of the waste;
 - (4) Name and address of the person producing the waste; and
 - (5) Date accumulation begins or date of acceptance at the storage facility.
- e. Empty containers contaminated with hazardous materials and/or hazardous materials shall be stored, handled, and processed as hazardous wastes or recycled whenever possible.
- f. The total number of containers storing hazardous waste in the storage area shall not exceed the designed capacity of the storage area at any one time.
- g. Containers used for storing hazardous waste shall be in a condition such that the containers can be safely transported, handled, or moved.
- h. If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator shall transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the conditions of this permit.
- i. Compatibility of Waste with Containers
- The owner or operator shall use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.
- j. Containment
- (1) For all containment areas, the owner or operator shall provide a spill containment system in accordance with the approved Operation Plan. Specifically, each hazardous waste storage area shall have a continuous base that is impervious to the waste stored and shall be designed and constructed so that any spills can be contained.

- (2) In addition to the requirements of (1) above, the containment system shall be constructed so that any surface water runoff can be contained, surface water runoff can be excluded, and shall have sufficient capacity to contain 10 percent of the volume of containers or the volume of the largest container, whichever is greater. Outdoor containment areas must also contain precipitation from a 24-hour, 25-year storm.
- (3) Spills, leaks and precipitation shall be promptly removed from the containment area to prevent overflow.

k. PCB Wastes

Containers holding polychlorinated biphenyls (PCBs) or devices containing PCB wastes shall comply with the applicable requirements of Part 761, Title 40, CFR.

2. Storage in Underground Tanks

a. Operation

- (1) Hazardous wastes shall not be placed in a tank if they could cause the tank or its liner to rupture, leak, corrode, or otherwise fail before the end of its intended life.
- (2) (Optional) Uncovered tanks shall be operated to ensure at least 60 centimeters (2 feet) of freeboard.
- (3) Valves on hazardous waste storage tanks shall be kept locked when the facility is unattended.
- (4) An accurate daily inventory of wastes shall be maintained and reconciled on each underground tank to determine natural gain or loss of waste. If significant gain or loss is noted, all meters and gauges shall be checked for error and reconciled; and if the discrepancy cannot be reconciled, the tank shall be tested and if necessary be emptied and repaired, or taken out of service.
- (5) Underground Tanks

Every underground facility used for storage, treatment, and/or transport of hazardous waste, including tanks, sumps, and pipelines (which has any portion of its total structure embedded in the ground) installed after January 1, 1984, shall meet the requirements of the H&SC section 25291, and shall as a minimum:

- (a) Be designed and constructed to provide primary and secondary levels of containment of the hazardous waste stored in accordance with the following performance standards:

- o Primary containment shall be product tight.
 - o Secondary containment shall be constructed (i.e., of materials of sufficient thickness, density, composition, and volume) to prevent structural weakening as a result of contact with any released hazardous waste; and also shall be capable of storing the hazardous waste for the maximum anticipated period of time necessary for the recovery of any released hazardous wastes.
 - o In the case of an installation with one primary container, the secondary containment shall be large enough to contain at least 100 percent of the volume of the primary tank.
 - o In the case of multiple primary tanks, the secondary container shall be large enough to contain 150 percent of the volume of the largest primary tank placed in it, or 10 percent of the aggregate internal volume of all primary tanks, whichever is greater.
 - o If the facility is open to rainfall, then the secondary containment shall meet the requirements of Chapter 6.7 of the California H&S Code.
- (b) Be designed and constructed with a monitoring system capable of detecting the entry of the hazardous waste stored in the primary containment into the secondary containment. Where secondary containment may be subject to water intrusion, a means of monitoring for water intrusion and safely removing the water in a controlled manner, shall be provided. The facility shall be designed to allow analysis of the water, and disposal, if contaminated, at an authorized disposal facility.
 - (c) Be designed and constructed to provide for overflow protection for any primary tank, including a overflow prevention device or an attention-getting high-level alarm, or both.
 - (d) Be managed and maintained to avoid intermixing of incompatible wastes stored in the same tank which may cause a fire or explosion or produce toxic or poisonous gases or may cause deterioration of primary and secondary containers.
 - (e) Undergo the standard installation testing requirements for underground storage systems specified in Section 2-7 of the Flammable and Combustible

Liquids Code, adopted by the National Fire Protection Association (NFPA 30) as amended and published annually in the Uniform Fire Code before the underground storage tank is covered, enclosed, or placed in use.

- (f) Undergo testing in operating conditions using a precision test as defined in National Fire Protection Association Pamphlet 329, "Recommended Practice for Handling Underground Leakage of Flammable and Combustible Liquids", as amended, to prove the integrity of an underground storage tank before the underground tank is placed in storage.

- (6) Existing underground storage facilities used for the storage of hazardous waste installed on or before January 1, 1984, which do not meet the requirements of H&S Code, Section 25292, and shall as a minimum:
 - (a) Outfit the facility with a monitoring system capable of the detecting unauthorized releases of any hazardous waste stored in the facility and thereafter, the operator shall monitor each facility, based on materials stored and the type of monitoring installed.

 - (b) Provide a means for visual inspection of the tank, wherever practical, for the purpose of the monitoring required by subdivision (a). Alternative methods of monitoring the tank on a monthly, or more frequent basis may be required by the Department, consistent with the regulations of the board.

The alternative monitoring methods include, but are not limited to, the following methods:

- o Precision testing as defined in National Fire Protection Association Pamphlet 329, "Recommended Practice for Handling Underground Leakage of Flammable and Combustible Liquids", as amended, for proving the integrity of an underground storage tank and piping system at time intervals specified by the board.

- o A groundwater monitoring well or wells which are downgradient and adjacent to the underground storage tank, vapor analysis within a well where appropriate, and analysis of soil borings at the time of initial installation of the well.

o A continuous leak detection and alarm system which is located in monitoring wells adjacent to an underground storage tank and which is approved by the Department.

(c) Submit proposal for the location and number of wells, the depth of wells, and the sampling frequency to the Department for approval prior to implementation.

(d) Compatibility of Waste with Tanks

The owner or operator shall use a tank made of or lined with materials which will not react with, and are otherwise compatible with the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

D. Management of Ignitable, Reactive, or Incompatible Wastes

1. The storage of ignitable, reactive, or incompatible wastes and materials shall be conducted so that it does not:

- a. Generate extreme heat or pressure, fire or explosion, or violent reaction;
- b. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;
- c. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
- d. Damage the structural integrity of the device or facility containing the waste; or
- e. Through other like means threaten human health or the environment.

2. Ignitable or Reactive Waste

- a. The owner or operator shall take precautions to prevent accidental ignition of ignitable wastes or reaction of reactive wastes. This waste shall be separated and protected from sources of ignition or reaction. While ignitable or reactive waste is being handled, the owner or operator shall confine smoking and open flame to specially designed locations. "No Smoking" signs shall be conspicuously placed wherever there is a hazard from ignitable or reactive waste.
- b. Each Drum or tank holding ignitable or reactive waste shall be situated at least 15 meters (50 feet) from the property line of the facility.
- c. Ignitable or reactive waste shall not be placed in a drum or tank for storage or treatment unless:

- (1) The waste is treated, rendered, or mixed before or immediately after placement in the drum or tank so that the resulting waste, mixture or dissolution of materials is no longer ignitable or reactive and item III.D.1 of this permit is complied with;
- (2) The waste is stored in such a way that it is protected from any material or condition which may cause the waste to ignite or react; or
- (3) The drum or tank is used solely for emergencies.

d. Storage of ignitable or reactive waste in covered tanks shall comply with the National Fire Protection Association buffer zone requirements published annually in National Fire Codes (Codes 30, Volume 3).

3. Incompatible Wastes

- a. Hazardous waste shall not be placed in an unwashed (container and/or tank) that previously held an incompatible waste or material.
- b. Areas used for storing containers of incompatible hazardous waste shall be widely separated. Impermeable physical barriers such as a berms, dikes, or walls shall be provided to ensure that commingling of incompatible hazardous wastes cannot occur.
- c. The following incompatible hazardous waste groups shall be adequately separated from each other during all handling and storage operations:

Examples:

- (1) Cyanides shall be separated from acids.
- (2) Organic acids shall be separated from toxics.
- (3) Reactive toxic metals shall be separated from water.

E. Recycling

If requested by the Department in accordance with Article 12, Chapter 30, Division 4, Title 22, CAC, the owner or operator shall, within 30 days submit a written statement justifying having not recycled a waste which the Department has determined to be recyclable.

F. Manifest System

1. The Owner and Operator Requirements

- a. The owner/operator shall complete and sign the generator section of the uniform hazardous waste manifest.
- b. The owner/operator shall describe the waste accurately. The description on the manifest shall include the type of waste, chemical composition, and special handling instructions.
- c. The owner/operator shall indicate on the manifest whether the waste is a hazardous or extremely hazardous waste.
- d. The owner/operator shall write on the manifest the Department of Transportation proper shipping name as required by the California Highway Patrol pursuant to Part 172, Title 49 CFR, for each load of hazardous waste before the waste is transported on a public road.
- e. The owner/operator shall submit a copy of the manifest for each load of a hazardous waste, with the generator section properly completed, to the registered hazardous waste hauler to whom he transfers custody of the waste when the transfer occurs.
- f. In cases of large waste volumes which require several loads, the owner/operator may submit one manifest daily to the same registered hazardous waste hauler as long as the waste, the driver, and the date of hauling remain unchanged. Each manifest shall include the volume of the waste hauled by the registered hazardous waste hauler.
- g. The producer of hazardous waste shall submit each month a legible copy of each manifest used during the previous month to the Department. The manifest shall contain all information required in the generator and transporter sections of the manifest. The producer of hazardous waste must contact the Department if a copy of the manifest is not received from the off-site disposal facility.

G. Analysis of Waste

1. Upon the effective date of this permit, the owner or operator shall follow the written waste analysis plan as described in the approved Operation Plan.
2. a. Prior to the storage of a particular type of hazardous waste for the first time the owner or operator shall:
 - (1) Conduct waste analyses ; or
 - (2) Obtain documented information on storage of similar waste under similar operating conditions.
- b. The information shall include data pertaining to the compatibility of wastes with the drum used for storage of these wastes.

- c. The owner or operator shall ensure that the storage of any hazardous waste will not:
 - (1) Generate extreme heat or pressure, fire or explosion, or violent reaction;
 - (2) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;
 - (3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
 - (4) Damage the structural integrity of the device or facility containing the waste; or
 - (5) Through other like means threaten human health or the environment.
3. The analysis shall be repeated, as necessary, to ensure that it is accurate and up-to-date. As a minimum, the analysis must be repeated when the owner or operator is notified or has reason to believe that the process operation generating the hazardous waste has changed.
4. The owner or operator shall verify the waste analysis plan as part of the quality assurance program. The quality assurance program will be in accordance with current U.S. EPA practices (Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 dated July 1982) or equivalent methods approved by the Department; and at a minimum ensure that the owner or operator maintain proper functional instruments, uses approved sampling and analytical methods, assures the validity of sampling and analytical procedures, and performs correct calculations.
5. Data developed for other purposes, and existing published or documented data on the hazardous waste or on waste generated from similar process may supplement the waste analysis plan.
6. Samples taken for the purpose of monitoring shall be representative of the monitored activity.
7. The owner or operator shall retain records of all monitoring information as part of the operating record until closure of the facility.
8. Records of monitoring information shall include:
 - a. The date, exact place, and time of sampling or measurement;
 - b. The individual(s) who performed the sampling or measurements;
 - c. The date(s) analyses were performed;
 - d. The individual(s) who performed the analyses;

- e. The analytical techniques or methods used;
- f. The results of such analyses; and
- g. Collected drain water sampling/disposal.

H. Security

1. The owner or operator shall prevent the entry of unauthorized persons or livestock onto the active portion of the facility by maintaining the following:
 - a. A fence in good condition or other artificial or natural barrier which completely surrounds (the active portion of) the facility and has gates or other means to control entry; or
 - b. A 24-hour surveillance system which continuously monitors and controls entry to (the active portion of the) the facility; or
 - c. The security procedures as described in the approved Operation Plan.
2. Signs indicating that the facility, or the hazardous waste area of the facility, contains hazardous wastes shall be placed on the perimeter fence at the entrance and at locations where it is anticipated that unauthorized persons may enter the active portion of the facility.

Wording of the signs shall be in English, "Caution ... Hazardous Waste Area ... Unauthorized Persons Keep Out", and Spanish, "Cuidado! Zona de Residuos Peligrosos. Prohibida la Entrada a Personas No Autorizadas". Signs will be legible from a distance of 25 feet.

I. Inspections

1. The owner or operator shall inspect the facility for malfunctions and deterioration, operator errors, and discharges which may cause or may lead to the release of hazardous waste constituents to the environment or a threat to human health. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.
2. The owner or operator shall inspect all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and pumps) that are important to preventing, detecting or responding to the environmental or human health hazards in accordance with the written inspection schedule in the approved Operation Plan.

3. The owner or operator shall test and maintain all safety and emergency equipment (alarm systems, fire protection equipment, spill control equipment, decontamination equipment) as necessary to ensure proper operation in the event of an emergency.
4. In accordance with the written inspection schedule in the approved Operation Plan, the owner or operator shall inspect:
 - a. The construction materials of the readily visible portions of the tank, at least weekly, and the rest of the tank structures, at least semiannually, to detect corrosion or leaking of fixtures or seams. These necessitate emptying and thorough cleaning of these units on the same frequency;
 - b. The shell thickness of all tanks to determine extent of corrosion. If excessive corrosion has occurred (readings indicate a difference of ten percent over readings taken before waste was first placed in the tank), the tank shall be emptied, cleaned, inspected, and corrective actions undertaken; and
 - c. The construction materials of, and the area immediately surrounding, discharge confinement structures, at least weekly, to detect obvious signs of leakage.
5. The owner or operator shall remedy any deterioration or malfunction of equipment or structures which the inspection identifies as soon as possible to ensure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately as described in the contingency plan.
6. The owner or operator shall record inspections in an inspection log or summary and shall keep these records for at least three years from the date of inspection.

J. Personnel Training

1. Facility personnel shall successfully complete the program of classroom instruction or on-the-job training which teaches them to perform at a level that ensures the facility's compliance with Chapters 6.5 and 6.7 of Division 20, H&S Code and with Chapter 30, Division 4, Title 22, CAC.
2. Personnel shall have successfully completed this program within six months after the date of their employment or assignment to a facility or to a new position at the facility whichever is later. Employees hired after the effective date of this permit shall not work in unsupervised positions until they have completed these training requirements.
3. Facility personnel shall take part in an annual review of the required training.
4. The owner or operator shall maintain the training records as identified in the approved Operation Plan.

5. Training records on current personnel shall be kept until closure of the facility. Training records on former employees shall be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

K. Contingency Plan

1. Implementation

- a. The owner or operator shall follow the contingency plan described in the approved Operation Plan.
- b. The provisions of the contingency plan shall be carried out immediately whenever there is a fire, explosion, release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

2. Distribution

A copy of the contingency plan and all revisions to the plan shall be:

- a. Maintained at the facility; and
- b. Submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called up to provide emergency services.

3. Amendment of Contingency Plan

The contingency plan shall be reviewed and immediately amended, if necessary, whenever:

- a. Applicable regulations are revised;
- b. The plan fails in an emergency;
- c. The permit is revised;
- d. The list of emergency coordinators changes;
- e. The list of emergency equipment changes; and
- f. The facility changes in its design, construction, operation or maintenance in a way that materially increases the potential for fire, explosions or releases of hazardous waste.

The owner or operator shall notify the Department of all amendments to the contingency plan.

4. Emergency Coordinator

At all times there shall be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator shall be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person shall have the authority to commit the resources needed to carry out the contingency plan.

5. Emergency Procedures

- a. Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) shall follow the procedures of the contingency plan as described in the approved Operation Plan.
- b. The owner or operator shall notify the Department and appropriate state and local authorities that the cleanup procedures are complete and all emergency equipment listed in the contingency plan is clean and fit for its intended use before the operations are resumed.
- c. The owner or operator shall note in the operating record the time, date, and details of any incident that requires implementing the contingency plan.
- d. The owner or operator shall submit within 24 hours an oral report and within 15 days a written report of each incident to the Department in accordance with item II.G.12. The Office of Emergency Services shall also be notified.

6. Arrangements with Local Authorities

- a. The owner or operator shall ensure that emergency response arrangements with local authorities are in effect upon the effective date of this permit.
- b. If local authorities refuse to enter into preparedness and prevention arrangements with the owner or operator, the owner or operator shall document this refusal in the operating record.

L. Required Equipment

1. The owner or operator shall have available at the facility all required safety and emergency equipment as described in the approved Operation Plan.
2. The facility water supply system shall be capable of providing water in adequate volume and pressure to maintain water hose streams.

3. The owner or operator shall maintain access to communication or alarm systems specified in the approved Operation Plan.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment shall be tested and maintained as necessary to ensure its proper operation in the time of emergency.

M. Required Aisle Space

The owner or operator shall maintain aisle space as needed to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.

N. Recordkeeping and Reporting

1. Availability, Retention, and Disposition of Records

- a. All records, including plans required in this permit, shall be furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of the Department, the State Water Resources Control Board or a Regional Water Quality Control Board.
- b. The owner or operator shall maintain until closure is completed and certified by an independent engineer registered in California, the following records, reports, documents, and all amendments, revisions, and modifications thereof at the owner or operator's place of business and at the facility, so as to be available at all times to operating personnel:
 - (1) Operating record.
 - (2) Training records for current employees.
 - (3) Hazardous Waste Facility Permit.
 - (4) Waste analysis plan.
 - (5) Contingency plan.
 - (6) Closure Plan.
 - (7) Closure cost estimates.
 - (8) Inspection Schedules.
- c. The owner or operator shall retain the following records at the facility for at least three years:
 - (1) Inspection records.
 - (2) Training records for former employees
 - (3) Copies of each manifest generated.

- d. The retention period for all records required in this permit is extended automatically during the course of any unresolved enforcement action regarding the facility or as requested by the Department.

2. Operating Record

- a. The owner or operator shall keep a written operating record at the facility.

The following information shall be recorded, as it becomes available, and maintained in the operating record until the closure of the facility:

- (1) The description and the quantity of each hazardous waste received, and the method(s) and date(s) of its storage at the facility;
- (2) The location of each hazardous waste within the facility and the quantity at each location. This information shall include cross-references to specific manifest document numbers, if the waste was accompanied by a manifest;
- (3) Records and results of waste analyses and trial tests performed;
- (4) Summary reports and details of all incidents that require implementing the contingency plan;
- (5) Records and results of inspections (except these data need be kept only three years);
- (6) Monitoring testing or analytical data;
- (7) All closure cost estimates; and
- (8) All waste minimization certifications.

3. Reporting and Notification Requirements

- a. All reports or other information requested by the Department shall satisfy the signatory requirements in (II.H). The wastes minimization certifications as required in item II.J shall signed in accordance with II.H.

- b. Annual Report

The owner or operator shall prepare and submit two copies of an annual report to the Department and one copy to the appropriate Regional Water Quality Control Board, by March 1 of each year beginning March 1, 1987. The annual report shall cover facility activities during the previous calendar year and shall include the following information:

- (1) The EPA identification number, name, and address of the facility;
- (2) The calendar year covered by the report;
- (3) Updated closure cost estimate for the facility;
- (4) The EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year; for imported shipment, the report shall give the name and address of the foreign generator;
- (5) The description, quantity, and method of treatment, storage, and/or disposal of each hazardous waste the facility received during the time period; listed by EPA identification number of each generator; and
- (6) Environmental monitoring data in accordance with Section 67195, Title 22, CAC.
- (7) A certification as required in item II.H.

0. Closure

1. Closure Plan and Amendment of Plan

- a. The owner or operator shall comply with the closure plan as described in the approved Operation Plan.
- b. The owner or operator may amend his closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.) The owner or operator shall propose to amend his plan any time changes in operating plans or facility design affect the closure plan or whenever there is a change in expected year of closure.
- c. The owner or operator shall submit to the Department for approval within 60 days, any proposed amendments made to the closure plan.
- d. The owner or operator shall notify the Department at least 180 days before the date he expects to begin closure.

2. Time Allowed for Closure

- a. Within 90 days after receiving the final volume of hazardous wastes or 90 days after approval of the closure plan if that is later, the owner or operator shall treat all hazardous wastes in storage or in treatment or remove them from the site in accordance with the approved closure plan.

- b. The owner or operator shall complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of waste or 180 days after approval of the closure plan, if that is later.
3. Disposal or Decontamination of Equipment
 - a. When closure is completed, all facility equipment and structures shall have been properly disposed of or decontaminated by removing all hazardous waste and residues.
 - b. At closure, all hazardous waste and hazardous waste residues shall be removed from tanks, discharge control equipment, and discharge confinement structures in accordance with the approved closure plan.
 4. Certification of Closure

When closure is completed, the owner or operator shall submit to the Department certification both by the owner or operator and by an independent engineer registered in California that the facility has been closed in accordance with the specifications in the approved closure plan.

P. Financial Responsibility

1. Cost Estimate for Facility Closure

- a. The owner or operator shall have a written estimate of the cost of closing the facility in accordance with the applicable closure requirements of this permit. The owner or operator shall keep this estimate, and all subsequent estimates, at the facility. The estimate shall equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive as indicated by its closure plan.
- b. The owner or operator shall prepare a new closure cost estimate whenever a change in the closure plan affects the cost of closure.
- c. By March 1 of each year, the owner or operator shall adjust the latest closure cost estimate using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its SURVEY OF CURRENT BUSINESS. The inflation factor shall be calculated by dividing the latest published annual Deflator by the Deflator for the previous year. The result is the inflation factor.

The adjusted closure cost estimate shall equal the latest closure cost estimate times the inflation factor.

- d. The adjusted closure cost estimate shall be submitted to the Department as part of the annual report required in III.N.3.b.

IV. CORRECTIVE ACTION FOR RELEASES OF HAZARDOUS WASTE

A. Background

Pursuant to Section 3004 (u) of the Hazardous and Solid Waste Amendment of 1984 (Resource Conservation and Recovery Act (RCRA) reauthorization), a permit issued after November 8, 1984 must require corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a RCRA permit. Permits issued must contain schedules of compliance for the corrective action and assurances of financial responsibility for completing the corrective action. In addition, Section 3004(v) requires that corrective action be taken beyond the boundary of hazardous waste facilities unless the owner/operator can demonstrate that permission to undertake this action is not obtainable.

B. Site Specific Considerations

The facility has soil and ground water contamination due to spillage of jet fuel in open ground.

C. Requirements

1. Upon execution of a settlement agreement between United States Marine Corps, El Toro, and the State of California, United States Marine Corps, El Toro shall implement corrective action in accordance with time schedules contained in the settlement agreement.
2. In the absence of execution of a settlement agreement, United States Marine Corps, El Toro, shall implement all corrective action in accordance with the time schedules contained in any administrative order issued by the Environmental Protection Agency or the Department of Health Services.
3. United States Marine Corps, El Toro, shall submit assurances of financial responsibility for completing such corrective action within 30 days after a settlement agreement has been filed or an administrative order issued in accordance with A and B of this section.
4. If no settlement agreement or administrative order concerning corrective action has been executed by September 30, 1986 then the following schedule shall be followed until such date as a settlement agreement is executed:

(a) Groundwater Contamination

- (1) Corrective Action Study Report - Groundwater Contamination. To be submitted by November 30, 1986. The Corrective Action Study Report - Groundwater

contamination shall identify the nature, extent, and migration of all hazardous waste groundwater contamination originating from, or associated with, activities by United States Marine Corps, El Toro, at, or adjacent to, the United States Marine Corps, El Toro, Facility.

- (2) Workplan for Corrective Action Program - Groundwater Contamination. To be submitted within three months after State approval of the Corrective Action Study Report - Groundwater Contamination. This workplan shall include work schedules and cost estimates specifying the measures that will be taken to mitigate contamination identified by the Corrective Action Study Report - Groundwater Contamination.
- (3) Implementation of Corrective Action Program - Groundwater Contamination. To begin within three months after state approval of the Corrective Action Program Workplan. Corrective Action work shall be performed in accordance with the State approved workplan, including the approved schedules. Any changes in this workplan must be approved by the state.

(b) Soil Contamination

- (1) Workplan for Corrective Action Study - Soil Contamination. To be submitted by November 30, 1986. The Corrective Action Study - Soil Contamination shall identify the nature, extent, and migration of all hazardous waste soil contamination associated with activities by at or adjacent to the United States Marine Corps, El Toro Facility.
- (2) Corrective Action Study Report - Soil Contamination. To be submitted one year after State approval of the Workplan.
- (3) Workplan for Corrective Action Program - Soil Contamination. To be submitted within three months after State approval of the Corrective Action Study Report - Soil Contamination. This workplan shall include work schedules and cost estimates specifying the measures that will be taken to mitigate contamination identified by the Corrective Action Study Report - Soil Contamination.
- (4) Implementation of Corrective Action Program - Soil Contamination. To begin within three months after state approval of the Corrective Action Program Workplan - Soil Contamination. Corrective action work shall be performed in accordance with the state approved workplan, including the approved schedules. Any changes in this workplan must be approved by the State.

ATTACHMENT E

EPA RCRA REVISED (1986) PART A APPLICATION

FR
ST
KULT

Haz. Waste
Storage

OC

6230
LJC.30 83
29 JUL 1986

Mr. John A. Binton
Department of Health Services
Toxic Substances Control Division
107 South Broadway, Room 7123
Los Angeles, CA 90012

Dear Mr. Binton:

As you may recall, the Defense Property Disposal Office (D.P.A. ID #CA6170023398) officially changed their name to the Defense Reutilization and Marketing Office last year, and as a result you requested we submit a revised Part A application for hazardous waste storage. Enclosures (1) and (2) are submitted to fulfill this requirement.

Sincerely,

WILLIAM J. ...
Asst. ...
By direction of Commanding General

Enclosures:
(1) EPA Form 1
(2) EPA Form 2

Blind copy to:
STA CFL
STA RAY
LJC
FM FILE
FM LOG

FOR: 1 GENERAL	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)	LABEL I.D. NUMBER F I C A 6 1 7 0 0 2 3 2 0 8
I. LABEL ITEMS EPA I.D. NUMBER FACILITY NAME FACILITY MAILING ADDRESS FACILITY LOCATION	CA6170023208 MCAS EL TORO FACILITIES MANAGEMENT DEPT CODE 1 JG SANTA ANA PLAGE LABEL IN THIS SPACE SANTA ANA, CA 92709	GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except V-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)			X	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may effect or be located in an attainment area? (FORM 5)	X			J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may effect or be located in an attainment area? (FORM 5)		X	

L. NAME OF FACILITY

1. SNIP MARINE CORPS AIR STATION, EL TORO

M. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
BEVERLY VAN CLEEF CODE 1 JG. 30	714 651 2821

N. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
SAME AS ABOVE			
B. CITY OR TOWN		C. STATE	D. ZIP CODE

O. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER					
SAME AS ABOVE					
B. COUNTY NAME			C. CITY OR TOWN		
ORANGE			SAME AS ABOVE		
D. STATE		E. ZIP CODE		F. COUNTY CODE (if known)	

VII. SIC CODES (4-digit, in order of priority)

A. FIRST 7 4 5 8 2 (specify) AIRCRAFT MAINTENANCE				B. SECOND 7 (specify)			
C. THIRD (specify)				D. FOURTH 7 (specify)			

VIII. OPERATOR INFORMATION

A. NAME 8 DEFENSE REUTILIZATION & MARKETING OFFICE								B. Is the name listed in Item VIII-A also the owner? <input type="checkbox"/> YES <input type="checkbox"/> NO	
---	--	--	--	--	--	--	--	--	--

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.) F - FEDERAL M - PUBLIC (other than federal or state) S - STATE O - OTHER (specify) P - PRIVATE						D. PHONE (area code & no.) 7 1 4 6 5 1 3 7 7 1			
--	--	--	--	--	--	---	--	--	--

E. STREET OR P.O. BOX MARINE CORPS AIR STATION ELTORO							
--	--	--	--	--	--	--	--

F. CITY OR TOWN SANTA ANA				G. STATE CA		H. ZIP CODE 9 2 7 0 9		IX. INDIAN LAND Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
------------------------------	--	--	--	----------------	--	--------------------------	--	--	--

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water) 8 5 - 1 1 1				D. PSD (Air Emissions from Proposed Sources) 9 P			
B. UIC (Underground Injection of Fluids) 9 U NONE				E. OTHER (specify)			
C. RCRA (Hazardous Wastes) CA 6 1 7 0 0 2 3 2 0 8				E. OTHER (specify)			

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Defense - Hazardous Waste is generated mainly through aircraft maintenance operations. Wastes streams include fuels, oils, battery wastes, cleaning compounds, paint wastes and decontaminating agents. Additional wastes are generated by facility maintenance functions such as replacement of PCB transformer and asbestos removal projects.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE <i>S. L. Hoey</i>		C. DATE SIGNED 7/29/86	
--	--	-----------------------------------	--	---------------------------	--

COMMENTS FOR OFFICIAL USE ONLY

C.					
----	--	--	--	--	--



U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
 Consolidated Permits Program
 (This information is required under Section 3005 of RCRA.)

EPA I.D. NUMBER

F	C	A	6	1	7	0	0	2	3	2	0	8	1
---	---	---	---	---	---	---	---	---	---	---	---	---	---

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

<input type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)	<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)
--	---

<table border="1"> <tr> <th>YR.</th> <th>MO.</th> <th>DAY</th> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </table> <p>FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)</p>	YR.	MO.	DAY				<table border="1"> <tr> <th>YR.</th> <th>MO.</th> <th>DAY</th> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </table> <p>FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN</p>	YR.	MO.	DAY			
YR.	MO.	DAY											
YR.	MO.	DAY											

B. REVISED APPLICATION (place an "X" below and complete item I above)

<input checked="" type="checkbox"/> 1. FACILITY HAS INTERIM STATUS	<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT
--	--

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

1. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

- AMOUNT - Enter the amount.
- UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
EXCAVATION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY			FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY			FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)					1. AMOUNT	2. UNIT OF MEASURE (enter code)		
1	S 0 2	600	G			5					
2	T 0 3	20	E			6					
3	S 0 1	5800	G			7					
4	S 0 2	175,000	G			8					
5						9					
6						10					

Amount includes "California Wastes"

ENCLOSURE (2)

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR INCLUDE DESIGN CAPACITY.

DESCRIBING OTHER PROCESSES (code "T04")

IN EACH PROCESS ENTERED HERE

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the wastes.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous wastes: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pound per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two waste are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03D80	
X-2	D002	400	P	T03D80	
X-3	D001	100	P	T03D80	
X-4	D002				included with above

EPA I.D. NUMBER (enter from page 1)

FOR OFFICIAL USE ONLY

CA 6170023208

W DUP 2 DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

NO.	EPA HAZ. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES			
				1. PROCESS CODES (enter)			
				17 - 20	17 - 20	17 - 20	17 - 20
1	F 0 0 3	35	P	S 0 1			
	D 0 0 3	255	P	S 0 1			
2	* 1 5 1	7,500	P	S 0 1			
	* 1 4 1	400	P	S 0 1			
	* 1 3 5	450,000	P	S 0 2			
6	* 3 3 1	7,350	P	S 0 1			
	* 3 5 2	3,700	P	S 0 1			
R	* 1 8 1	770	P	S 0 1			
	* 4 6 1	56,680	P	S 0 1			
	* 5 1 2	35,400	P	S 0 1			
11	* 5 1 3	4,230	P	S 0 1			
	5 5 1	123	p	S 0 1			
13	* 2 1 2	400	P	S 0 1			
	* 2 1 1	2,800	P	S 0 1			
	* 2 1 3	17,000	P	S 0 1			
16	* 2 1 4	8,000	P	S 0 1			
	* 2 2 1	600,000	P	S 0 2			
18	* 6 1 1	700	P	S 0 1			
	* 2 6 1	500	P	S 0 1			
21							
23							
20							

ATTACHMENT F

HAZARDOUS WASTE ACCUMULATION POINTS MAP

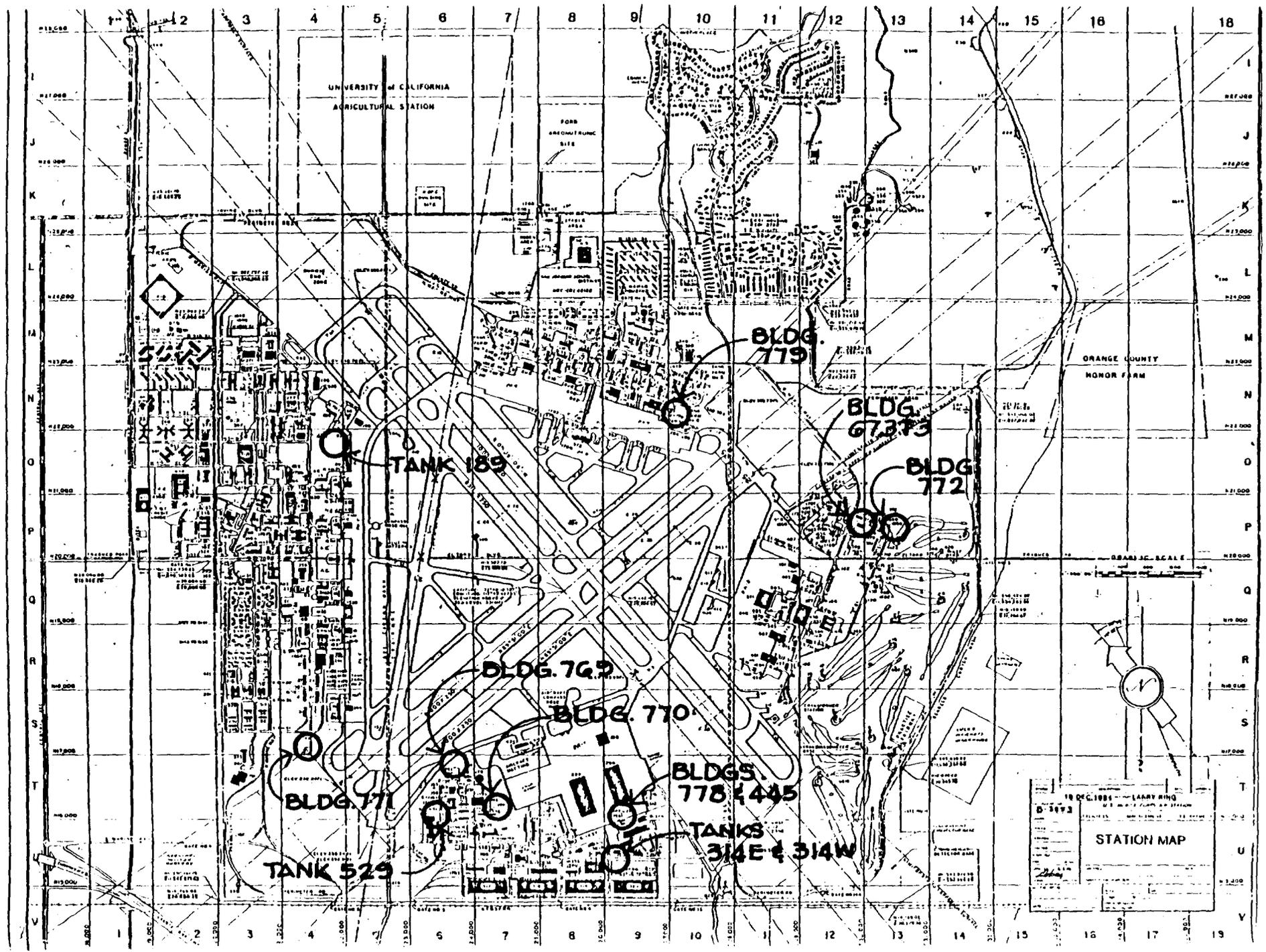


FIGURE 1

ATTACHMENT G

SITE PHOTOGRAPHS

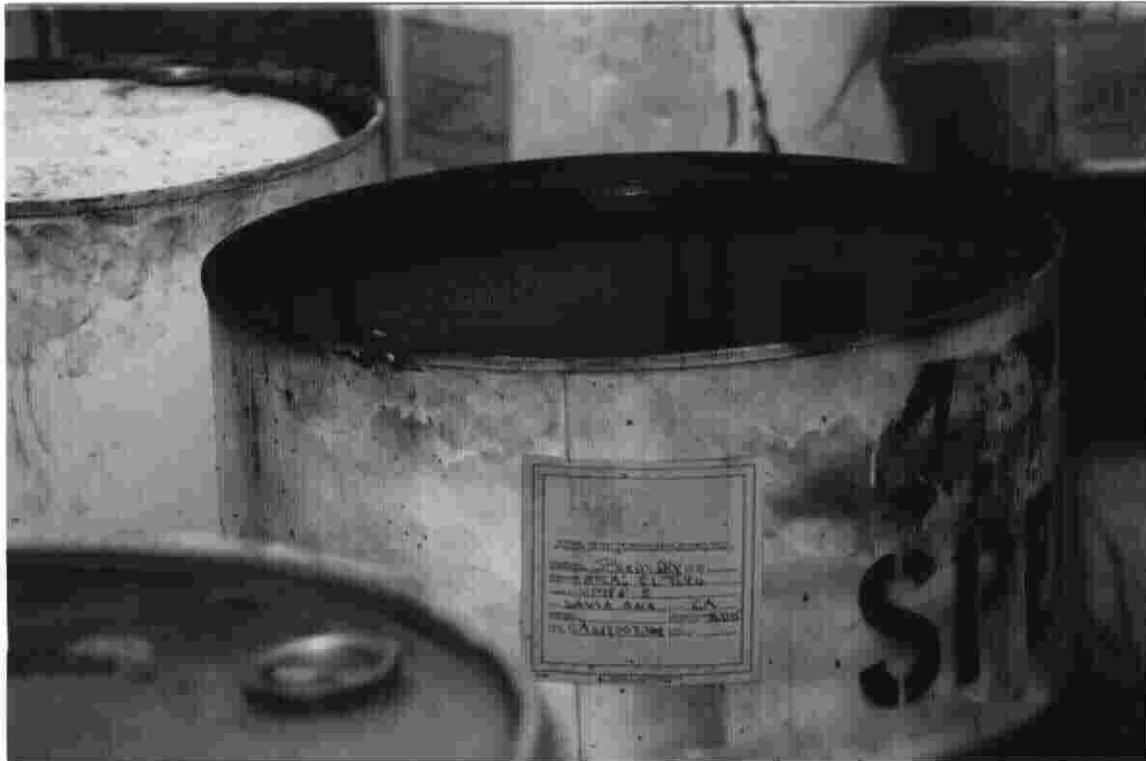
Date:	03/05/87
Time:	8:00 a.m - 11:45 a.m.
Photographer:	J. Fernandez
Witness:	Carole Missirlian
Facility Representative:	Beverly Van Cleef



**Photograph #1: Area #445 - Drums lacking adequate labelling
and plastic bags containing asbestos waste.**



Photograph #2: Area #772 - FS smoke drums on unpaved and unroofed area -- Drums outside the fenced area are empty.



Photograph #4: Area #769 - Drum in poor condition.



**Photograph #5: Area #771 - Drums containing Soda ash or acid residues.
Note the rain water accumulating in the contained area**



Photograph #6: Area #779 - Drums stored on unpaved area.



Photograph #8: Area 673T3 - Hazardous Waste Storage Hangar.



**Photograph #7: Area #779 - Waste paint thinner drums before shipping.
Note the lack of adequate labelling.**



Photograph #9: Area #673T3 - Chemical Spill. Note the poor condition of the drums. A drainage ditch lays behind the berm.



Photograph #10: Area #779 - Open container.

ATTACHMENT H

SPILL CLEAN UP MEMORANDUM

Memorandum

DATE: 18 MAR 1987

FROM: LJG

TO: 1JF.43, Ray Asher

1JE

1JF

SUBJ: HAZARDOUS WASTE CLEAN-UP

1. On 4 March a spill in Bldg 673T3 was reported to you and a service call was placed requesting the oil be cleaned up.
2. On 11 March you called requesting written direction as to how to procede in cleaning up this spill. You said D. Ramirez had poured Safestep onto it and it thickened into a molasses-like material. This is not surprising because Safestep is a fine power.
3. Procede as follows:
 - a. Instruct your personnel to wear protective gloves and clothing.
 - b. Pour just enough Speedy Dry on it to to solidify it enough to shovel it.
 - c. Shovel it into drums.
 - d. Label drum "Oily Spill Residue from Bldg 673T3, 3/4/87."
 - e. Contact this office if the Speedy Dry does not adsorb the oil or if any other problem is encountered.
 - f. The area will require additional cleanup.
 - (1) Remove drums from the area.
 - (2) Remove the oily plastic liner and replace with a new, clear plastic liner.
 - (3) Any drums or pallets that have contacted the spill will require wiping or steam cleaning at a washrack with an oil/water separator.
 - (4) Put contaminated rags in drum with spill residue.

C. M. CHURCHMAN
LTJG, CEC, USN

ATTACHMENT I

**HAZARDOUS WASTE MANIFESTS
SELECTED FOR EXAMINATION**

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

DL 700 55-D-0047

1987-03-03

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CA61700	Manifest Document No. 100-30	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address MCA'S EL TORO FACILITIES MANAGEMENT DEPT. INC. SANTA ANA, CA 92709				A. State Manifest Document Number 84714458		
4. Generator's Phone (301) 397-7314				B. State Generator's ID CA6170023208		
5. Transporter 1 Company Name AMERICAN PROCESSING CO. INC.		6. US EPA ID Number CAT03001341D		C. State Transporter's ID 903202		
7. Transporter 2 Company Name				D. Transporter's Phone (69) 425-0282		
8. US EPA ID Number				E. State Transporter's ID		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT KETTLEMAN HILLS FACILITY 2321 RD SKYLINE RD KETTLEMAN CITY, CA 95239				10. US EPA ID Number CAT000646117		G. State Facility's ID CAT000646117
				H. Facility's Phone 209-386-9711		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. WASTE PAINT FLAMMABLE LIQUID UN1263				008 DM	10.416 G	211, 212, 213, 331
b. WASTE FLAMMABLE LIQUID NOS UN1993				005 DM	002.75 G	211, 212, 213
c. WASTE BLEACHING POWDER DRAIN-C UN2208				003 DM	1.200 P	141
d. WASTE COMBUSTIBLE LIQUID NOS COMBUSTIBLE LIQUID UN1993				005 DM	002.75 G	211, 212, 213
Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above a. = 19/03 b. = 99/03 c. = 03 d. = 99/03		
15. Special Handling Instructions and Additional Information WPH# D30486 (LINE A) 2001 WPH# F56018 2001 WPH# F56047 2002 WPH# F56122 2001						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.						
Printed/Typed Name JOHN L. ROBERS, JR.				Signature <i>[Signature]</i>		Date 11/7/87
17. Transporter 1 Acknowledgment of Receipt of Materials						
Printed/Typed Name TIM CARSON				Signature <i>[Signature]</i>		Date 11/7/87
18. Transporter 2 Acknowledgment of Receipt of Materials						
Printed/Typed Name JAMES W. KIERLY				Signature <i>[Signature]</i>		Date 11/7/87
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name <i>[Name]</i>				Signature <i>[Signature]</i>		Date 11/7/87

GENERATOR 04114458

YELLOW: TSDf SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS

COPY TO DKTMO

0026

DO 0045, 0049, 0050, 0054, 0057, 0060

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CA 6 1 7 0 0 2 3 2 0 8		Manifest Document No. 01	2. Page of 2	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address MCAS El Toro Facilities Mgmt. Dept. Code IJG Santa Ana, Ca. 92709				Emer #801-399-7814 After Hr. 801-399-7011		A.State Manifest Document Number 84714611		
4. Generator's Phone (619) 651-3771						B.State Generator's ID CA6170023208		
5. Transporter 1 Company Name Amerian Processing Co., Inc.		6. US EPA ID Number C A T 0 8 0 0 1 3 4 1 0				C.State Transporter's ID 703203		
7. Transporter 2 Company Name		8. US EPA ID Number				D.Transporter's Phone (619)425-0282		
9. Designated Facility Name and Site Address Casmalia Resources NTU Rd. Casmalia, Ca. 93429		10. US EPA ID Number C A D 0 2 0 7 4 8 1 2 5				E.State Transporter's ID		
						F.Transporter's Phone		
						G.State Facility's ID CAD020748125		
						H.Facility's Phone (805) 937-8449		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS WASTE SOLID NOS ORM-E NA9189					081	DM00000	G	512 513
b. WASTE CORROSIVE SOLID, NOS CORROSIVE MATERIAL UN1759					003	DM01220	P	352
c. HAZARDOUS WASTE SOLID NOS ORM-E NA9189					007	DM02300	P	352 611
d. WASTE (LAB-PACK) DICHLOROMETHANE ORM-A UN1593					001	DM00020	G	211
J. Additional Descriptions for Materials Listed Above (Ii) EMPTY CRUSHED DRUMS (IiD) SHELF-LIFE PAINT STRIPPER					K.Handling Codes for Wastes Listed Above 03			
15. Special Handling Instructions and Additional Information								
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.								
Printed/Typed Name LARRY LITTE						Signature <i>Larry Little</i>		Date 11/1/87
17. Transporter 1 Acknowledgement of Receipt of Materials								
Printed/Typed Name STEVEN P KLIBBE						Signature <i>Steven P Klippe</i>		Date 01/21/87
18. Transporter 2 Acknowledgement of Receipt of Materials								
Printed/Typed Name						Signature		Date
19. Discrepancy Indication Space								
J. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. #82-577								
Printed/Typed Name Casmalia Resources/Andrew						Signature <i>Andrew</i>		Date 01/21/87

DLH-200-85-D-0049

DEL. ORD 0034 + 0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <i>CA 6170023208</i>		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address <i>RICHAS EL TORO FACILITIES MGMT CODE 1EJ SANTA ANA, CA</i>						A. State Manifest Document Number 84714518				
4. Generator's Phone <i>(714) 651-3771</i>						B. State Generator's ID <i>CA6170023208</i>				
5. Transporter 1 Company Name <i>AMERICAN PROCESSING CO., INC</i>			6. US EPA ID Number <i>CA T080013410</i>			C. State Transporter's ID <i>703203</i>		D. Transporter's Phone <i>(619) 425-0282</i>		
7. Transporter 2 Company Name			8. US EPA ID Number			E. State Transporter's ID		F. Transporter's Phone		
9. Designated Facility Name and Site Address <i>CHEMICAL WASTE MANAGEMENT 35251 OLD SKYLINE RD. KETTLEMAN CITY, CA. 93239</i>						10. US EPA ID Number <i>CA T000646117</i>		G. State Facility's ID <i>CA T000646117</i>		
						H. Facility's Phone <i>(209) 386-9711</i>				
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE FLAMMABLE (D001) FLAMMABLE LIQUID, NOS LIQUID UN1993						003 DA		00.080	G	212 213
b. WASTE FLAMMABLE FLAMMABLE (D001) LIQUID, NOS LIQUID UN1993						00.1 DA		000.55	G	211, 212 213
c. WASTE CORROSIVE (D002) ALKALINE LIQUID, NOS MATERIAL NA1719						001 DM		00.041	G	123
d. WASTE FLAMMABLE (D001) PAINT LIQUID UN1263						006 DA		00.318	G	211, 212. 213, 331
14. Additional Descriptions for Materials Listed Above <i>(a) WASTE AND/OR CONTAMINATED ORGANIC SOLVENTS (b) WASTE METHYLENE CHLORIDE BASED STRIPPER (c) ALKALINE CLEANING COMPOUND</i>						15. Handling Codes for Wastes Listed Above <i>a, b, c, d 99/03</i>				
15. Special Handling Instructions and Additional Information <i>(a) WASTE PAINT AND RESIDUAL WASH THINNERS (b) WP # F56023 (c) WP # F56018 (d) WP # F56017 (e) WP # D80422</i>										
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.										
Printed/Typed Name <i>DEAN PICKERING</i>						Signature <i>[Signature]</i>		Date <i>07/23/86</i>		
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name <i>STEVE KLIBBE</i>		Signature <i>[Signature]</i>		Date <i>07/23/86</i>
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name		Signature		Date
19. Discrepancy Indication Space										
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Printed/Typed Name <i>Ricardo S Abelleira</i>		Signature <i>[Signature]</i>		Date <i>07/27/86</i>

84 (145) y

copy returned 8/1/86

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

D.O. 0045 0049 0057 0054

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CA 6 1 7 0 0 2 3 2 0 8		Manifest Document No. 4 of 1		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address MCAS El Toro Facilities Mgmt. Dept. Code IJG Emer. #301-399-7814 Santa Ana, Ca. 92709 After Hr. 801-399-7011						A. State Manifest Document Number 84714693			
4. Generator's Phone (714) 651-3771						B. State Generator's ID CA6170023208			
5. Transporter 1 Company Name American Processing Co., Inc.				6. US EPA ID Number CAT 0 8 0 0 1 3 4 1 0		C. State Transporter's ID 703197		D. Transporter's Phone (619) 425-0282	
7. Transporter 2 Company Name				8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Pepper Oil Company 2300 Tidelands Ave. National City, Ca. 92050				10. US EPA ID Number CAT 0 0 0 6 1 3 5 4 7		G. State Facility's ID CAT000613547		H. Facility's Phone (619) 477-9336	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE COMBUSTIBLE COMBUSTIBLE LIQUID, NOS LIQUID UN1993 001TT 24.57 G									213 221
b.									
c.									
d.									
Additional Descriptions for Materials Listed Above 80% WATER, 15% STODDARD SOLVENT, 5% OIL						K. Handling Codes for Wastes Listed Above 01			
15. Special Handling Instructions and Additional Information GLOVES									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.									
Printed/Typed Name DEAN PICKERING						Signature <i>Dean Pickering</i>		Date 12/04/86	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name MICHAEL BUCHHOLZ						Signature <i>M. Buchholz</i>		Date 12/04/86	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name						Signature		Date	
19. Discrepancy Indication Space									
Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name D.M. COBB						Signature <i>D.M. Cobb</i>		Date 12/05/86	

GENERATOR

TRANSPORTER

FACILITY

memo 2/24/87

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

DO 0026, 0045, 0049, 0050, 0054, 0060

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CA 6 1 7 0 0 2 3 2 0 8	Manifest Document No. 57-2-24	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address MCAS El Toro Facilities Mgmt. Dept. Code IJG Santa Ana, Ca. 92709			A. State Manifest Document Number 84714752		B. State Generator's ID CA6170023208		
4. Generator's Phone (714) 651-3771			6. US EPA ID Number CATO 8 0 0 1 3 4 1 0		C. State Transporter's ID 703199		
5. Transporter 1 Company Name American Processing Co., Inc.			7. Transporter 2 Company Name		D. Transporter's Phone (619) 425-0282		
9. Designated Facility Name and Site Address Oil & Solvent Processing Co. 1704 West First St. Azusa, Ca. 91702			10. US EPA ID Number CAD008302903		E. State Transporter's ID 703199		
					F. Transporter's Phone (619) 425-0282		
					G. State Facility's ID CAD008302903		
					H. Facility's Phone (818) 334-5117		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. WASTE FLAMMABLE LIQUID FLAMMABLE LIQUID NOS UN1993			001	TT	02.003	G	211, 212 213
b. WASTE FLAMMABLE LIQUID FLAMMABLE LIQUID NOS UN1993			001	TT	00175	G	211, 212 213
c.							
d.							
J. Additional Descriptions for Materials Listed Above					K. Handling Codes for Wastes Listed Above a. 99/0001 b. 99/0001		
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.							
Printed/Typed Name					Signature		Date
							Month Day Year
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name STEVEN P KLIBBE					Signature Steven P. Klibbe		Date 01/21/87
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name James F. O'Connell					Signature James F. O'Connell		Date 01/22/87
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name					Signature		Date
							Month Day Year

ATTACHMENT J

DRAFT CONTINGENCY PLAN

6.0 OIL AND HAZARDOUS SUBSTANCE
SPILL CONTINGENCY PLAN
FOR U.S. MARINE CORPS AIR STATION EL TORO

6.1 INTRODUCTION

An Oil Spill Contingency Plan (SCP) is required for MCAS El Toro by 40 CFR 112.7 (d), which states that in cases where spill control structures or equipment would be impractical to prevent spills from reaching navigable waters, the owner shall provide a strong spill contingency plan with a written commitment of manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged. A spill contingency plan for hazardous substances is required by 40 CFR 265.1 which applies to owners and operators of facilities which treat, store or dispose of hazardous waste.

Although most of the facilities at MCAS El Toro which handle oil or hazardous substances have been provided with spill control equipment, or will be provided with such equipment in the near future, a spill could occur in uncontrolled areas during the transfer of hazardous materials. In addition, failure of spill control facilities could result in a discharge, and spills which occur inside containment areas must be cleaned up.

This SCP includes procedures in accordance with State, Federal and Navy regulations concerning spills of oil, hazardous materials and hazardous wastes. Major components of the plan include Recognition, Evaluation, Control, and Documentation and Cost Recovery. Each spill scenario will be unique; however, the procedures outlined in this plan are applicable to all spills occurring on the Station. The size of the spill and the dangers posed will determine the extent to which this plan is applied.

6.2 RECOGNITION

Recognition is the initial response to a spill event. Major components of this phase of response include discovery, notification and identification.

Discovery

A spill will normally be discovered by casual observation, as part of a routine investigation, or during handling or use of a hazardous substance. All personnel at MCAS El Toro who are involved in operations should be trained in proper procedures to be followed in the event that they should discover a spill, and unauthorized personnel should be cautioned against attempting to deal with a spill. The primary responsibility of a discoverer is to notify the proper authorities who are trained and equipped to deal with such events.

Notification

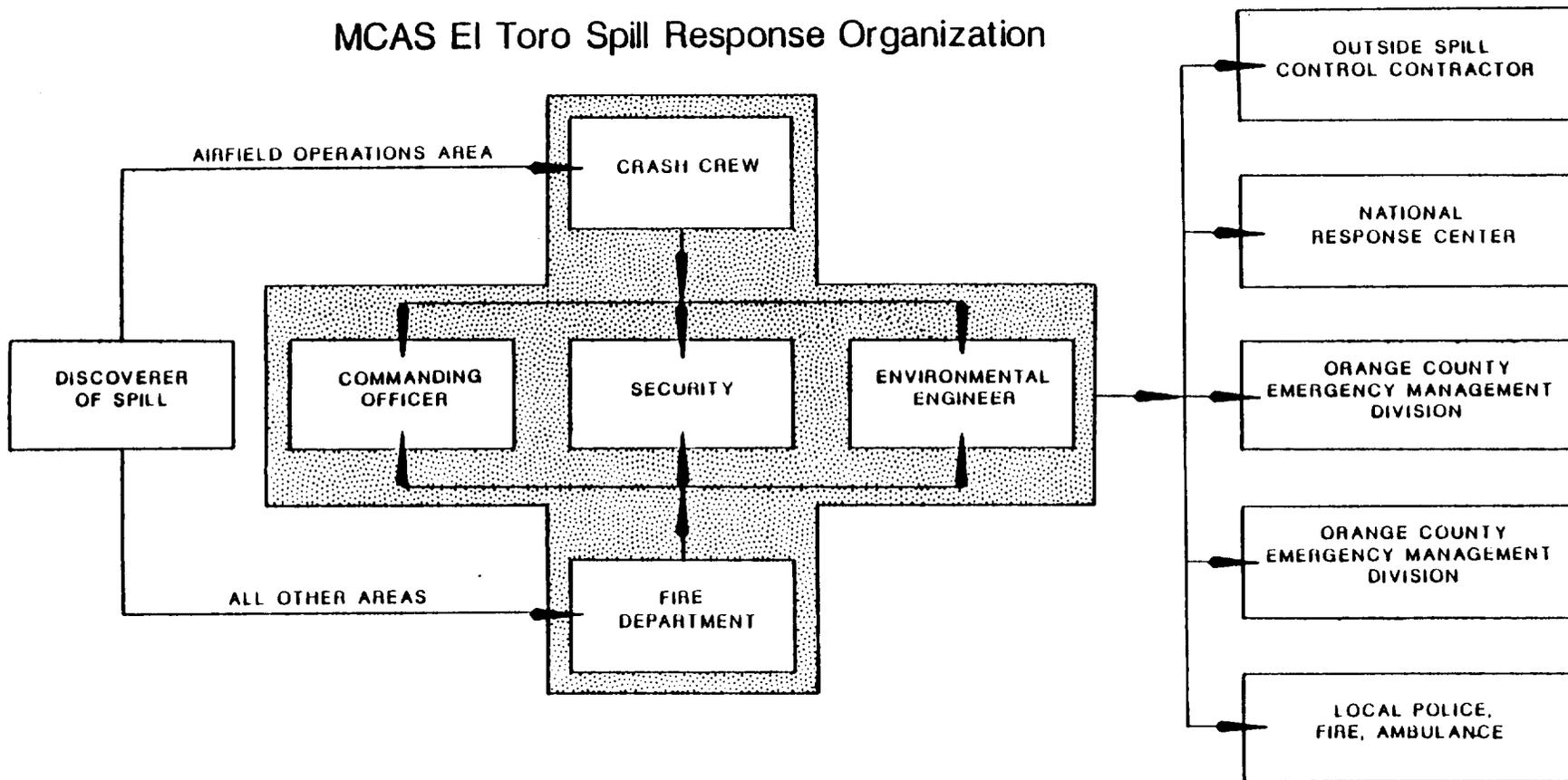
The person who first discovers a spill or leak of hazardous material shall note the size of the spill; the location; if possible, determine the type of material; determine if the spill is contained; and note any hazards which are present (i.e. fire, injuries, etc.). Depending on the location of the spill, the person must take the following actions.

- A) If the spill has occurred on or around the runways or taxiways, in the aircraft maintenance hangars, or in any other area associated with aircraft operations, the MCAS El Toro crash crew should be notified.

- B) If the spill has occurred anywhere on the Station outside of the aircraft operations area, the MCAS El Toro Fire Department should be notified.

Each of these organizations will have a person qualified to act as the On-Scene Coordinator (OSC), and personnel assigned to an On-Scene Operations Team (OSOT). The OSC is responsible for notification of the environmental engineer, who will then, based upon information given by the OSC, make a determination of the required further notifications. Additional organizations and individuals which may need to be informed of the incident are outlined in Figure 4, which is a schematic of the notification system.

MCAS El Toro Spill Response Organization



-609-



MCAS EL TORO SPILL NOTIFICATION SYSTEM

Identification

Before cleanup procedures can begin, it is essential that the spilled substances are properly identified, and that the physical, chemical and toxicological properties of the substances are known. Knowledge of these properties will help establish the anticipated behavior and associated problems involved with handling a material, as well as provide information which will assist in selection of the methods and equipment to be used to clean and dispose of the spill. All personnel are cautioned not to deal with a spill prior to identification.

In some instances, it may be necessary to sample a spilled substance and conduct laboratory analyses in order to properly identify the material. The need for such a costly and time-consuming procedure can be at least partially eliminated by proper labeling and documentation of hazardous material containers. This straightforward and inexpensive practice is the most effective method of identification, and will be highly beneficial in the event of a spill.

6.3 EVALUATION

Subsequent to the identification of a spilled substance, an evaluation of the potential hazards posed by the spill must be conducted. This phase of response should be performed by qualified individuals who have training and experience in dealing with environmental episodes, due to the nature of their decisions, which will affect the entire response effort. Evaluation is the process of determining the effects of a spill event on public health, response personnel and the environment. The major factors to be considered in this phase are the degree of hazard, and impact of the spill.

Impact

The actual impact which a spill demonstrates is dependent upon the location of the spill, weather, geography, population, and other site-specific conditions which influence the behavior of the released substance within the environment. The impact of a spill event may be measured by the existing undesirable effects which have occurred, or by the anticipated risk to the population and environment due to the spill.

Degree of Hazard

A hazardous substance spill poses a threat due to the inherent characteristics of the materials. The normal safeguards

associated with the use, storage, handling and disposal of the materials are compromised, elevating the possibility of harm to people, property or the environment. Knowledge of the spilled substance's hazardous properties, i.e. flammability, toxicity, carcinogenicity, etc., can be used to assist in the determination of the level of hazard which exists at the spill site. An evaluation of the probability of harm being caused by an environmental episode must be conducted to determine levels of protective clothing that must be worn by response personnel, the necessity for evacuation, and safe methods of cleanup and control.

At this point it should be noted that there exists a strong interrelationship among the elements of a spill response effort. Recognition, evaluation and control are the three major action components, but there is not necessarily a sequential order in which they should be implemented. In some instances, preliminary control measures may be instituted before identification and risk assessment are completed, while other situations may dictate complete identification before containment procedures can be started.

6.4 CONTROL

Control of an environmental incident may be defined as preventing or reducing real or potential hazards to the

environment, public health, and the health and safety of response personnel. This plan presents consideration of site safety, site control and work zones, protective clothing for response personnel, containment, cleanup methods and techniques and decontamination of personnel and equipment. Preliminary control procedures should be implemented as soon as possible, consistent with the specific situation. As additional information is obtained through the recognition and evaluation procedures, control actions may be changed as required.

Site Safety

Safety is of primary concern during response operations to a spill event. A qualified safety person should be available to issue safety instructions to all response personnel. This individual may be the On-Scene Coordinator, the Environmental Engineer, or a trained member of the On-Scene Operations Team.

Site Control-Work Zones

A spill site must be controlled to prevent or reduce the possibility of exposure to contaminants and the transport of hazardous substances from the site. One of the best methods of site control is to establish zones in which prescribed operations occur. The movement of personnel and equipment is restricted to predetermined access control points, limiting

the potential for contamination to migrate from the work area. Three concentric zones are recommended:

- 1) Exclusion Zone - The exclusion zone is the innermost area, and contains the site where contamination has occurred, or could be expected to occur.

- 2) Contamination Reduction Zone - This zone surrounds the exclusion zone, and provides a transition area between contaminated and clean areas. Decontamination of personnel and equipment should be conducted within this zone.

- 3) Support Zone - The support zone, the outermost area of the site, is considered to be a noncontaminated area. Contaminated or potentially contaminated people and equipment are not permitted in this zone, but must remain in Zone 2 until decontaminated.

The size and shape of each of these zones should be based on site-specific conditions, including physical and topographical features, weather conditions, properties of the spilled substance, and dimensions of the contaminated area. Boundaries between the zones should be flexible to allow for modifications in the response activities.

Protective Clothing

Clothing designed to protect the body from chemical hazards can be divided into four categories according to the level of protection provided.

LEVEL A: Should be worn when the highest level of respiratory, skin and eye protection is needed. Level A clothing consists of an approved pressure-demand self-contained breathing apparatus, a fully encapsulating chemical-resistant suit, chemical-resistant gloves (both inner and outer), chemical-resistant boots with steel toe and shank, and intrinsically safe 2-way radio communications. Optional equipment includes coveralls, long cotton underwear, hard hat, and disposable protective suit, gloves and boots worn over the fully encapsulating suit.

LEVEL B: Provides a lesser degree of skin protection, but maintains the highest level of respiratory protection. Level B clothing consists of an approved pressure-demand self contained breathing apparatus, chemical-resistant coveralls, chemical-resistant gloves (inner and outer), boots with steel toe and shank, a hard hat and intrinsically safe two-way radio communications. Optional equipment for Level B protection includes coveralls, outer chemical-resistant disposable boots, and a face shield.

LEVEL C: Should be selected only when the type of airborne substance is known, the concentration is measured, criteria for using air-purifying respirators are met, and chemical splashes are not likely to occur. Level C protection includes a full-face, air-purifying, canister-equipped respirator, chemical-resistant coveralls, outer chemical-resistant gloves, chemical-resistant boots with steel toe and shank, hard hat and intrinsically safe two-way radio communications. Optional equipment consists of coveralls, inner chemical-resistant gloves, outer chemical-resistant disposable boots, face shield and an escape mask.

LEVEL D: Should not be worn on any site with respiratory or skin hazards. It is primarily a work uniform providing minimal protection. Level D clothing includes coveralls, leather or chemical-resistant boots with steel toe and shank, and a hard hat, with optional equipment consisting of gloves, outer chemical-resistant disposable boots, safety glasses or chemical splash goggles, face shield and an escape mask.

In all spill response operations, selecting the proper level of protective clothing is imperative in reducing the potential for adverse health effects. Personnel making initial entry to a site with unknown conditions should be provided with a minimum of Level B clothing. In addition, the "buddy system" should be used in all response activities.

Containment

Once the incident has been evaluated, and appropriate equipment and protective clothing has been selected, the primary objective of the OSOT is containment of the spilled material. Most of the spills which occur at MCAS El Toro are anticipated to be land-based in nature. The major goal in containment of these spills is to prevent them from reaching the storm sewer system and consequently, navigable waters. Containment operations should begin concurrently with control of the spill source. Earthen berms or ditches are the fastest and most effective control structures to contain the types of spills expected to occur at the Station. A stockpile of soil that can be easily compacted into a relatively impermeable condition should be maintained exclusively for spill response. Also, equipment should be readily available for transporting the soil to the spill site and constructing the berm.

Spills which reach water are somewhat more difficult to contain, due to the limited access to the storm sewer system. Containment operations should be conducted at the nearest open channel downstream of the spill event. If the channel is unlined, it may be excavated to create a pit or lagoon which will contain the spill. In lined channels, a boom should be installed to retain insoluble floating materials, or the channel should be dammed to prevent flow.

Cleanup Methods

Spilled material must be cleaned up and disposed of as soon as it has been contained. This is especially important for spills which occur on the ground surface, to reduce the amount of hazardous substance which penetrates the soil. Several methods are available to clean up spills of hazardous liquids. For small spills, sorbent materials should be applied, and the contaminated sorbents disposed of as hazardous waste. For larger spills it may be necessary to use a vacuum truck to remove the spill. All soil which has been contaminated by the spill should be excavated and placed in 55-gallon drums for disposal as hazardous waste.

Decontamination

Protective clothing and equipment used in response to a spill must be fully decontaminated before they are removed from the area. Disposable clothing items should be placed in drums and disposed of as hazardous waste. Other clothing and equipment should be thoroughly cleaned and restored to good working order before being returned to its storage space. Personnel should be decontaminated by showering.

6.5 DOCUMENTATION AND COST RECOVERY

Each spill should be documented jointly by the On-scene Coordinator and the Environmental Engineer, and kept on file in a permanent log.

The report should include the following:

- 1) Name, rank, address and telephone numbers of the person(s) making the report.
- 2) Date, time and location of the spill.
- 3) Identification and quantity of the spilled substance.
- 4) Procedures used for cleanup and decontamination.
- 5) Cause of spill
- 6) Recommended improvements and/or safeguards to prevent recurrence of the event.
- 7) Date and time spill was reported to the National Response Center, if applicable.

- 8) Name of individual contacted at the NRC.
- 9) Names and departments of all personnel involved in response to the spill.
- 10) Estimated economic impact of the spill.

Economic impacts of a hazardous substance spill and resultant cleanup operations can range from the direct cost of product loss, spill containment, cleanup, disposal, and restoration to indirect costs associated with the spill (e.g., personnel injury). These costs vary considerably. Cleanup costs, for example, may reflect the use of an in-house response crew trained in hazardous material spill response, along with protective gear and cleanup equipment. Alternatively, outside spill response contractors, local emergency services or outside contractors may be used. Costs of this alternative will vary with the level of service provided.

ATTACHMENT K

1986 ANNUAL REPORT

CALIFORNIA STATE DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION

ANNUAL FACILITY HAZARDOUS WASTE
REPORT FOR 1986

This report is for the calendar year ending December 31, 1986.

Read instructions carefully before making any entries on this form.

The front page of this report form must be completed and returned regardless of facility status.
Please print/type with elite type (12 characters per inch): One character per box.

DRAFT

I. FACILITY EPA I.D. NUMBER

CA16117190121312018

II. FACILITY NAME

MARIWE CORP'S AIR STATION ELI TORIO

III. LOCATION OF FACILITY

FACILITIES IN GMIT DEPT, CO DE ING

Street or P.O. Box

SIANTIA ANIA

City or Town

CA 92709

State Zip Code

ORANGE

County

IV. FACILITY MAILING ADDRESS (If different from Section III. above.)

SAME

Street or Route Number

City or Town

State Zip Code

County

V. FACILITY CONTACT

VAN RIEFF, BEVERLY

Name

714-1651-2821

Area Code

Phone Number

VI. COST ESTIMATES FOR FACILITIES (Whole dollar amounts)

\$ 1550000 \$ 0

A. Cost Estimate for Facility Closure

B. Cost Estimate for Post Closure Monitoring and Maintenance

VII. NONREGULATED STATUS (If nonregulated, complete only this page of the form.)

1. This facility *did not* treat, store, or dispose of regulated quantities of hazardous waste at any time during 1986
2. This facility is operating with a variance from permit requirements (attach a copy).
3. This facility has submitted a request for a variance from permit requirements (attach a copy)
4. This facility has requested that the Part A Application be withdrawn (attach a copy)
5. This facility has undergone closure (attach certification letter).
6. Other:

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Print/Type Name

Title

Signature

Date Signed

IX. FACILITY EPA I.D. NUMBER

C1A6170023208

WASTE STORAGE (Complete this section for waste stored for more than 90 days. Use whole numbers.)

Type of Storage	Average Monthly Quantity In Storage	Total Capacity	Unit of Measure
1. Container (Drum, Barrel) <i>estimated</i> (S01)	150000	150000	2
2. Tank (S02)	110000	117500	2
3. Waste Pile (S03)			
4. Surface Impoundment (S04)			
5. Other: (S05)			

XI. WASTE DISPOSAL (Complete this section only if waste is disposed of at the facility. Use whole numbers.)

NO ON SITE DISPOSAL

Type of Disposal	Annual Quantity Disposed	Capacity Remaining As Of December 31, 1986	Unit Of Measure
1. Injection Well (D80)			
2. Landfill (D81)			
3. Land Application (D82)			
4. Ocean Disposal (D83)			
5. Surface Impoundment (D84)			
6. Other: (D85)			

XII. WASTE TREATMENT (Complete this section for waste treatment methods used at the facility, include recycling. Use whole numbers.)

NO ON SITE TREATMENT

Treatment Method	T or R	Total Amount Treated/Recycled	Annual Capacity	Unit of Measure
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				

XIII. COMMENTS (List any explanations or significant events which influenced capacities or throughput for Sections X-XII above.)

X.1 - includes storage capacity in buildings 445, 67313, 769, 770, 771, 772, 773 and 774.

300 445 can store	100 drums	= 5500g
300 67313 can store	300 drums	= 27500g
300 769	64 drums	= 3520g
300 770	64 drums	= 3520g
300 771	64	3520
300 772	64	3520
300 773	64	3520
300 774	64	3520
		<u>54,120g Total</u>

X.2 - includes storage capacity of tanks: 189, 529, 314E and 314W

ANNUAL FACILITY HAZARDOUS WASTE REPORT FOR 1986

This report is for the calendar year ending December 31, 1986

XIV. FACILITY EPA I.D. NUMBER

C1A6117001232P18

XV.

1. The waste streams reported on this page were generated on the facility.
2. The waste streams reported on this page were received from an off-site generator.

XVI. WASTE IDENTIFICATION AND MANAGEMENT

A. WASTE TREATMENT AND STORAGE

Report only waste treated or stored at this facility. Report quantities using whole numbers. List treatment or storage steps in sequential order for each waste code. One waste stream per section.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Handling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I. 1	Battery acid with lead	D902 F1	1111	SO1	48	G	
2							
3							
4							
5							
6					6531	P	
II. 1	Batteries containing acid	D1012	1111	SO1	6531	P	
2							
3							
4							
5							
6							
III. 1	Acid without METAL	D102	112	SO1	799	G	
2							
3							
4							
5							
6							
IV. 1	Unspecified ACID SOLUTION	D102	1133	SO1	11	G	
2							
3							
4							
5							
6							

XVI. WASTE IDENTIFICATION AND MANGEMENT

B. ULTIMATE DISPOSAL;

Report the final disposition of all hazardous waste handled by the facility. Report quantities from corresponding sections of XVI., Part A. Report quantities using whole numbers.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I. 1	Battery acid with lead	D01012	1111	T716	48	G	X
2							
3							
4							
II. 1	Batteries containing acid	D01012	1111	R1P	65310	P	X
2							
3							
4							
III. 1	Acid without metal	D10012	1112	D81	100	G	X
2				T34	600	G	X
3							
4							
IV. 1	Unspecified acid solution	D002	113	D81	11	G	X
2							
3							
4							

XVII. COMMENTS (Label entries by section and line number.)

XVI. B. III. 2 - Treatment method unknown

ANNUAL FACILITY HAZARDOUS WASTE REPORT FOR 1986

This report is for the calendar year ending December 31, 1986

XIV. FACILITY EPA I.D. NUMBER

CA 6170023208

XV.

1. The waste streams reported on this page were generated on the facility.
2. The waste streams reported on this page were received from an off-site generator.

XVI. WASTE IDENTIFICATION AND MANAGEMENT

A. WASTE TREATMENT AND STORAGE

Report only waste treated or stored at this facility. Report quantities using whole numbers. List treatment or storage steps in sequential order for each waste code. One waste stream per section.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I. 1	(KOH) metal Alkaline Solution without	D002	122	301	140	G	
2							
3							
4							
5							
6							
II. 1	Unspecified Alkaline solution	D102	123	301	139	G	
2							
3							
4							
5							
6							
III. 1	Off spec. aged inorganics	D102	141	301	153	G	
2							
3							
4							
5							
6							
IV. 1	Off spec aged inorganics	D102	141	301	13482	P	
2	(includes potassium bicarbonate, calcium hypochlorite, triseryl-phosphate, etc.)						
3							
4							
5							
6							

XVI. WASTE IDENTIFICATION AND MANGEMENT

B. ULTIMATE DISPOSAL;

Report the final disposition of all hazardous waste handled by the facility. Report quantities from corresponding sections of XVI., Part A. Report quantities using whole numbers.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I.	1 Alkaline Solution without metal	D1002	1,2,2	T,3,4	1,40	G	
	2			D,8,1	1,40	G	X
	3						
	4						
II.	1 Unspecified alkaline solution	D1002	1,2,3	T,3,4	1,39	G	
	2			D,8,1	1,39	G	X
	3						
	4						
III.	1 Off spec, aged inorganics	D10102	1,4,1	D,8,1	1,53	G	X
	2						
	3						
	4						
IV.	1 Off spec, aged organics	D1002	1,4,1	D,8,1	1,348,2	P	X
	2						
	3						
	4						

XVII. COMMENTS (Label entries by section and line number.)

XVI.B.I.1 - Treatment method unknown.

XVI.B.II.1 - Treatment method unknown.

ANNUAL FACILITY HAZARDOUS WASTE REPORT FOR 1986

This report is for the calendar year ending December 31, 1986

XIV. FACILITY EPA I.D. NUMBER

CA617010232018

XV.

1. The waste streams reported on this page were generated on the facility.
2. The waste streams reported on this page were received from an off-site generator.

XVI. WASTE IDENTIFICATION AND MANAGEMENT

A. WASTE TREATMENT AND STORAGE

Report only waste treated or stored at this facility. Report quantities using whole numbers. List treatment or storage steps in sequential order for each waste code. One waste stream per section.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Handling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I. 1	Robestos		151	SO1	4,8465	P	
2							
3							
4							
5							
6							
II. 1	INORGANIC SOLID	D003	181	SO1	4,820	P	
2		D002					
3							
4							
5							
6							
III. 1	TRICHLOROTRIFLUOROETHANE	F001	211	SO1	55	G	
2							
3							
4							
5							
6							
IV. 1	1,1,1-Trichloroethane	F001 U1226	211	SO1	165	G	
2							
3							
4							
5							
6							

XVI. WASTE IDENTIFICATION AND MANGEMENT

B. ULTIMATE DISPOSAL;

Report the final disposition of all hazardous waste handled by the facility. Report quantities from corresponding sections of XVI., Part A. Report quantities using whole numbers.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I. 1	Asbestos		15,1	DB,1	48,463	P	X
2							
3							
4							
II. 1	INORGANIC SOLID	D003	18,1	DB,1	4820	P	X
2		D002					
3							
4							
III. 1	TRICHLOROTRIFLUOROETHANE	F001	21,1	R10	55	G	X
2							
3							
4							
IV. 1	1,1,1-TRICHLOROETHANE	F001 U224	21,1	R10	65	G	X
2							
3							
4							

XVII. COMMENTS (Label entries by section and line number.)

ANNUAL FACILITY HAZARDOUS WASTE REPORT FOR 1986

This report is for the calendar year ending December 31, 1986

XIV. FACILITY EPA I.D. NUMBER

CA611710023208

XV. 1. The waste streams reported on this page were generated on the facility.
 2. The waste streams reported on this page were received from an off-site generator.

XVI. WASTE IDENTIFICATION AND MANAGEMENT

A. WASTE TREATMENT AND STORAGE

Report only waste treated or stored at this facility. Report quantities using whole numbers. List treatment or storage steps in sequential order for each waste code. One waste stream per section.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I. 1	Chlorinated solvent	D001 U226	211	301	483	G	
2							
3							
4							
5							
6							
II. 1	Alcohol and acetone	U102	212	301	110	G	
2							
3							
4							
5							
6							
III. 1	Petroleum Waste		221	502	448246	G	
2							
3							
4							
5							
6							
IV. 1	Unspecified oil containing waste		223	301	55	G	
2							
3							
4							
5							
6							

XVI. WASTE IDENTIFICATION AND MANGEMENT

B. ULTIMATE DISPOSAL;

Report the final disposition of all hazardous waste handled by the facility. Report quantities from corresponding sections of XVI., Part A. Report quantities using whole numbers.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I.	1 chlorinated solvent		211	D, 4, 7	4, 8, 3	G	
	2			D, 8, 1	4, 8, 3	G	X
	3						
	4						
II.	1 Acetone & Alcohol	F 0, 0, 3	212	D, 8, 1	1, 0	G	X
	2						
	3						
	4						
III.	1 Petroleum waste		221	R 1, 0	4, 4, 8, 2, 4, 6	G	X
	2						
	3						
	4						
IV.	1 Unspecified oil containing waste		223	D, 8, 1	5, 5	G	X
	2						
	3						
	4						

XVII. COMMENTS (Label entries by section and line number.)

XVI, B. I. 1 - Treatment method unknown

ANNUAL FACILITY HAZARDOUS WASTE REPORT FOR 1986

This report is for the calendar year ending December 31, 1986

XIV. FACILITY EPA I.D. NUMBER

C1A611710035208

- XV. 1. The waste streams reported on this page were generated on the facility.
 2. The waste streams reported on this page were received from an off-site generator.

XVI. WASTE IDENTIFICATION AND MANAGEMENT

A. WASTE TREATMENT AND STORAGE

Report only waste treated or stored at this facility. Report quantities using whole numbers. List treatment or storage steps in sequential order for each waste code. One waste stream per section.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I. 1	Unspecified oil containing waste		223	Soil	1500	P	
2							
3							
4							
5							
6							
II. 1	Off spec, aged organics	D901	331	Soil	904	G	
2							
3							
4							
5							
6							
III. 1	Off spec, aged organics	D1901	313	Soil	385	P	
2							
3							
4							
5							
6							
IV. 1	Mixed organic solvents	D0101	343	Soil	869	G	
2							
3							
4							
5							
6							

XVI. WASTE IDENTIFICATION AND MANGEMENT

B. ULTIMATE DISPOSAL;

Report the final disposition of all hazardous waste handled by the facility. Report quantities from corresponding sections of XVI., Part A. Report quantities using whole numbers.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I. 1	Unspecified oil containing waste		22,3081		1,500	P	X
2							
3							
4							
II. 1	Off spec, aged organics	D001	331	T47	904	G	
2				D81	904	G	X
3							
4							
III. 1	Off spec, aged organics	D101	331	D81	385	P	X
2							
3							
4							
IV. 1	Mixed organic solvents	D101	343	T47	867	G	
2				D81	867	G	X
3							
4							

XVII. COMMENTS (Label entries by section and line number.)

XVI B. II.1 - Treatment method unknown.
 XVI B. IV.1 - Treatment method unknown.

ANNUAL FACILITY HAZARDOUS WASTE REPORT FOR 1986

This report is for the calendar year ending December 31, 1986

XIV. FACILITY EPA I.D. NUMBER

CA 6170P23208

XV.

1. The waste streams reported on this page were generated on the facility.
2. The waste streams reported on this page were received from an off-site generator.

XVI. WASTE IDENTIFICATION AND MANAGEMENT

A. WASTE TREATMENT AND STORAGE

Report only waste treated or stored at this facility. Report quantities using whole numbers. List treatment or storage steps in sequential order for each waste code. One waste stream per section.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I. 1	Organic solids	D10101	352	S01	4235	P	-
2	(includes spill residue						
3	and oily rags)						
4							
5							
6							
II. 1	Empty containers ^{residual H.W.} with	D10101	512	301	36566	P	-
2							
3							
4							
5							
6							
III. 1	Contaminated soil	D901	611	301	234518	P	-
2							
3							
4							
5							
6							
IV. 1	Cyanide waste	P030	711	301	10	G	-
2							
3							
4							
5							
6							

XVI. WASTE IDENTIFICATION AND MANGEMENT

B. ULTIMATE DISPOSAL;

Report the final disposition of all hazardous waste handled by the facility. Report quantities from corresponding sections of XVI., Part A. Report quantities using whole numbers.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)		Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I.	1 Organic Solids	D1991		352	D81	4235	P	X
	2							
	3							
	4							
II.	1 Empty containers ^{residual H.W.} containing	D1991		513 512	D81	36566	P	X
	2							
	3							
	4							
III.	1 Contaminated soil	D10101		611	D81	234518	P	X
	2							
	3							
	4							
IV.	1 Cyanide waste	P10130		711	D81	10	G	X
	2							
	3							
	4							

XVII. COMMENTS (Label entries by section and line number.)

ANNUAL FACILITY HAZARDOUS WASTE REPORT FOR 1986

This report is for the calendar year ending December 31, 1986

XIV. FACILITY EPA I.D. NUMBER

01611710123208

XV.

1. The waste streams reported on this page were generated on the facility.
2. The waste streams reported on this page were received from an off-site generator.

XVI. WASTE IDENTIFICATION AND MANAGEMENT

A. WASTE TREATMENT AND STORAGE

Report only waste treated or stored at this facility. Report quantities using whole numbers. List treatment or storage steps in sequential order for each waste code. One waste stream per section.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)	Calif. Waste Code	Handling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I. 1	Mercury waste	U1151		T2591	1	P	
2							
3							
4							
5							
6							
II. 1							
2							
3							
4							
5							
6							
III. 1							
2							
3							
4							
5							
6							
IV. 1							
2							
3							
4							
5							
6							

XVI. WASTE IDENTIFICATION AND MANGEMENT

B. ULTIMATE DISPOSAL;

Report the final disposition of all hazardous waste handled by the facility. Report quantities from corresponding sections of XVI., Part A. Report quantities using whole numbers.

Line Number	Description of Waste	EPA Hazardous Waste Number (See Code List)		Calif. Waste Code	Hand-ling Method	Amount of Waste	Unit of Measure	Shipped Offsite
I.								
1	Mercury waste	61511		725	DB1	1	P	X
2								
3								
4								
II.								
1								
2								
3								
4								
III.								
1								
2								
3								
4								
IV.								
1								
2								
3								
4								

XVII. COMMENTS (Label entries by section and line number.)

ATTACHMENT L

DRAFT CLOSURE PLAN

CLOSURE PLANS FOR MCAS EL TORO

XIII. CLOSURE

This closure plan covers all identified Hazardous Waste Collection Facilities (HWCF) and waste storage tanks at MCAS El Toro. Refer to Figure 1 for location of these facilities and tanks.

This plan will be reviewed annually. It will be updated whenever the closure requirements change or the HWCF design, operation or usage changes. See Appendix E for Annual Checklist to up-date Closure Plan. The checklist lists questions to help determine if the Plan needs revision.

The closure plans are based on the requirements of Title 22, Article 23,⁽³⁾ and the enumerated scope items as noted in the DHS "Instructions for preparing an operation plan for a hazardous waste storage and/or treatment facility which involves containers and/or tanks only."⁽²⁾ In addition, tank site closure is based on Title 23, Article 7⁽⁴⁾ and the County of Orange, "Guidelines for the Removal of an Underground Tank." Refer to Appendix C and D, respectively. The highlighted scope items are repeated followed by the discussions.

A. The closure plan must indicate:

1. How and when the facility will be partially and ultimately closed.

Presently, all operational HWCF's will remain fully open as long as the base remains open.

Although it is intended that all waste tanks will be used, one or more tanks may be taken out of service temporarily. A tank may be closed temporarily if it has presently stopped storing HW and it is intended that it will store HW again within the next 2 years. In this case, the closure requirements as outlined in Title 23, Article 7 Part 2671 - Temporary Closure will apply. The following outlines the temporary closure steps:

- a) All residual liquids, solids or sludges will be removed and properly disposed of at an approved treatment, storage or disposal area.
- b) The storage tank will be purged of flammable vapors to an acceptable level.

- c) The storage tank may be filled with a non-hazardous, non-corrosive liquid.
- d) Locked caps or concrete plugs will seal fill and access piping.
- e) Power service to pumps will be disconnected.
- f) Continuation of underground storage tank monitoring will be determined by the local agency.
- g) To verify that temporary closure actions are still in place, tanks will be checked a minimum of once ever 3 months.

The HWCF'S and waste tanks will be closed at a time when corresponding base activities close, when there is no longer a need for the facility or when the entire base is closed.

2. The maximum extent of the facility which will remain open during the life of the facility.

While HWCF'S/tanks are opreational they will be completely open.

3. How the need for maintenance after closure will be minimized.

At time of closure, the hazardous waste sites will be completely decontaminated eliminating the need for continued maintenance after closure. See Section A.6 for closure steps.

4. How escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall and waste decomposition products to groundwater, surface water or the atmosphere after closure will be controlled, minimized, or eliminated to protect health and the environment.

As the structures and surrounding area will be thoroughly decontaminated and all hazardous wastes properly disposed of offsite at time of closure, escaped hazardous waste, hazardous waste constituents, leachate, contaminated rainfall and waste decomposition products will not be a threat to the environment after closure.

5. An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility.

Building 673T3 can store a maximum of approximately 500-55 gallon drums. Each smaller HWCF can store a maximum of forty 55 gallon drums (2200 gallons) within a fenced enclosure.

The tank capacities are as follows:

<u>Tank No.</u>	<u>Volume</u>	<u>Tank Material</u>
Tank 189	50,000 gallons	Concrete
314E	50,000 gallons	Concrete
314W	50,000 gallons	Concrete
529	25,000 gallons	Concrete

6. The steps required to decontaminate facility equipment during closure.

Table A.6.1 lists by site, the minimum number of soil borings, minimum number of concrete core samples required and the types of analyses required to be performed on the samples. The table is based on information obtained from the Energy/Environmental Office at El Toro and from site investigations.

The following steps will be followed to decontaminate all sites:

- a. Containerize all remaining hazardous waste and hazardous waste residue from facilities/tanks and any appurtenant equipment and structures.

Haul containers to an approved treatment, storage or disposal area. For tanks, if they stored flammable substances the tank will be purged of the flammable vapors.

- b. Remove or decontaminate concrete.

Tank Sites

By the time of closure concrete tanks will be quite old and susceptible to deterioration. For this reason, they will be demolished and material hauled to an approved hazardous waste disposal area.

HWCF Sites

Concrete core samples will be taken from areas of concrete where spillage may have occurred. Refer to Table A.6.1 for the minimum number of samples required and the respective Site Plans for their approximate locations. The sample will be analyzed for the hazardous substances given in Table A.6.1. Also, the hazardous waste manifest for El Toro must be consulted to determine all hazardous waste types which

have been stored at the site during its lifetime. If any types of hazardous waste other than those given listed have been stored at the facility, the samples will also be tested for these substances. If the analysis shows the concrete to be contaminated beyond acceptable limits, the facility will be demolished and material hauled to a certified offsite hazardous waste disposal area. If the concrete is not contaminated beyond acceptable limits, the facility will be left in place and washed down and scrubbed to remove any surface contaminants. All wash water will be collected in containers, labeled and hauled to a proper disposal site.

- c. Excavate and haul all contaminated soil to an approved offsite hazardous waste disposal site.

Refer to Table A.6.1 for the minimum number of borings required. More borings may be necessary to accurately determine the extent of any contamination. See the respective Site Plans for approximate boring locations.

Tank Sites

Soil samples will be taken and analyzed for the same hazardous substances listed for the concrete sample. See Section A.6.b.

Each tank site requires a minimum of three soil borings. One boring will be made alongside the tank near the fill valve. The other 2 will be made at the bottom of the excavated site centered beneath the tank. Borings will be deep enough to determine if any leakage has occurred. Samples will be taken at the surface and at every 5' interval.

HWCF Sites

Soil samples will be taken and analyzed for the same hazardous substances listed for the concrete samples. See Section A.6.b.

One boring will be made in front of the facility entrance. The others will be made in the surrounding area where spills may have occurred or at locations of exterior storage. Borings should be made over a wide enough area so the limits of contamination can be defined.

At each boring, a soil sample will be taken at the surface and at a depth of 5 feet. If the sample at 5 feet shows signs of contamination, the boring will continue down and samples taken at 5 foot intervals until no contamination is found.

- d. Thoroughly steam clean all equipment used in closing the facility. All wash water will be containerized, labeled and disposed of at an approved hazardous waste site.

- e. In accordance with the County of Orange, Tank Closure Requirements, the following is also required for tank sites:
 - 1) A facility modification application plans and closure fee submitted to County of Orange, Environmental Health.

 - 2) Closure and/or excavation permits obtained from City or County Fire Department, City or County Building Department and the South Coast Air Quality Management District.

- 3) 48 hours notice provided to the Environmental Health and City and/or County Fire Department for an on-site inspection of the tank removal.

 - f. Obtain a certification from an independent engineer registered in the State of California verifying that the facility has been closed in accordance with the specifications of the approved closure plan.

 - g. Notify DHS of completed Closure.

 - h. Complete the tasks listed in the checklists for final closure (Appendix E).
7. A schedule for final closure, including anticipated date when wastes will no longer be received, anticipated date when final closure will be complete, and intervening milestone dates which will allow tracking of the progress of closure.

The California DHS will be notified at least 180 days prior to beginning closure activities at the hazardous waste sites. At this time the DHS will review the current closure plan to determine its adequacy and may prescribe modifications.

After the last hazardous waste has been received at the facility, it will be removed and disposed of offsite within 90 days and the closure activities of the site will be completed within 180 days.

8. An estimate of what it will cost to implement this closure plan, as described in Section 67002, Title 22, California Administrative Code.

Refer to Table A.8.1 for the closure cost estimate. The estimates are based on the following assumptions:

1. Some soil is contaminated and will need to be excavated.
2. A minimum of two soil samples will be taken at each boring.
3. All facilities/tanks must be demolished.
4. The contaminated soil and material must be hauled to an approved hazardous waste disposal area.

- B. Describe procedures to ensure that the closure plan is amended whenever changes in facility design or operation occur.

The closure plan will be reviewed and up-dated annually. It will also be up-dated whenever the closure requirements change or any of the HWCF's/tank's design, operation or usage change.

- C. Describe procedures to ensure that DHS will be notified at least 180 days prior to the expected date of closure.

Refer to Section A-7 (Schedule for Final Closure) and Closure Checklist (Appendix E).

- D. Describe procedures to ensure that, at closure, all hazardous wastes are removed from the following facilities and all appurtenant structures and equipment are decontaminated or removed:

1. Container storage areas.

Refer to Section A-6 (Steps to Decontaminate Facility) and Final Closure Checklist (Appendix E).

2. Tanks.

Refer to Section A-6 (Steps to Decontaminate Facility) and Final Closure Checklist (Appendix E).

- E. Describe plans to ensure that, at closure, all contaminated concrete and soils are sampled, analyzed and removed, if necessary.

Refer to Section A-6 (Steps to Decontaminate Facility) and Final Closure Checklist (Appendix E).

- F. Describe plans to ensure that when closure is complete, the owner or operator submits a certification by the owner or operator and an independent engineer registered in California that the facility has been closed in accordance with the specifications in the specifications in the approved closure plan.

Refer to Section A-6 (Steps to Decontaminate Facility) and Final Closure Checklist (Appendix E).