

MUCCSC. 001157

## JOINT LETTER

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX  
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San Francisco, CA 94105-3901

### STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY

#### DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 4  
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#### CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SANTA ANA REGION  
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November 1, 1993

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#### MARINE CORPS AIR STATION (MCAS) EL TORO

SUBJECTS: 1) REQUEST FOR REMOVAL ACTION AT AGUA CHINON WASH  
2) REQUEST FOR TIMELY SOIL GAS SURVEY

#### 1) REQUEST FOR REMOVAL ACTION AT AGUA CHINON WASH

Results from the *Phase I Remedial Investigation (RI) Report (Draft Technical Memorandum)*, dated May 7, 1993, indicate significant concentrations of total fuel hydrocarbons (TFH) in subsurface soils at Agua Chinon Wash, at depths ranging from 20 to 40 feet below ground surface (bgs). Of particular importance is a TFH-gasoline result at sampling location 18\_ACAB223 of 131,000 mg/kg (approximately 13 percent gasoline) at 20 feet bgs. The same sample had a TFH-diesel result of 15,300 mg/kg.

Several months ago, in accordance with Section 11.1 of the Federal Facilities Agreement (FFA) for MCAS El Toro, the U.S. Environmental Protection Agency, the California Department of Toxic Substances Control and the California Regional Water Quality Control Board (henceforth referred to as regulatory agencies) had verbally notified the Navy of this situation which potentially endangers the environment. In fact, the minutes of a July 6-7, 1993 Data Quality Objective (DQO) Meeting indicate that the Navy would consider implementing a removal action at this location. It has been the regulatory agencies' understanding that the Navy was promoting removal actions as a priority. However, the regulatory agencies are unaware of any removal progress at Agua Chinon Wash to date.

In accordance with Section 11.3(f) of the FFA, the regulatory agencies hereby submit this written request that the Navy take an appropriate response action at Agua Chinon Wash as is necessary to abate the danger of an actual release and protect the environment.

**2) REQUEST FOR TIMELY SOIL GAS SURVEY**

The July 6-7, 1993 DQO Meeting minutes also indicate the regulatory agencies proposed that the Navy conduct a soil gas survey to focus the Phase II RI field effort by identifying volatile organic compound (VOC) source areas. The regulatory agencies believe that such soil VOC source areas could be contributing to the on-base and regional groundwater plume; soil VOC source areas were not identified in the Phase I RI effort. Moreover, the soil gas survey could potentially identify hot spots in the on-base landfills and washes. Soil gas survey results could support the decision whether to further characterize landfill hot spots in the Phase II RI field effort (see *Conducting Remedial Investigations/Feasibility Studies for CERCLA Municipal Landfill Sites*, February 1991 (OSWER Directive 9355.3-11) and draft guidance entitled *Presumptive Remedy for CERCLA Municipal Landfill Sites*, June 1993 (Superfund Publication 9355.0-49FS)). One such landfill, the Magazine Road Landfill (Site 2), is known to be releasing VOCs into groundwater.

The regulatory agencies believe it is crucial to utilize the soil gas results in defining the scope of work for the Phase II RI. The El Toro Team agreed that this important objective could be accomplished through a Sampling and Analysis Plan (SAP) Amendment which would be submitted to the regulatory agencies for review and approval prior to implementation of the Phase II RI field effort on March 8, 1994. However, to date, the regulatory agencies have not received a detailed proposal for the soil gas survey. It is the regulatory agencies' understanding that the Phase II RI workplan currently being prepared will only provide a general soil gas survey approach. The regulatory agencies believe that a delay in the soil gas survey implementation will result in a delay in the Phase II RI field effort start date.

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The regulatory agencies hereby request that the Navy submit a detailed soil gas survey proposal as soon as possible for review and approval. Furthermore, the regulatory agencies request that a soil gas survey be conducted in a timely manner so that the results can be used to define the scope of the Phase II RI field effort without delay.

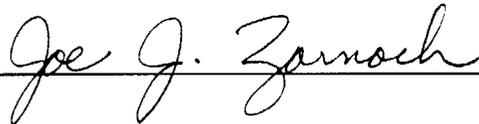
If you have any questions concerning this matter, please contact John A. Hamill, Joe J. Zarnoch and/or John Broderick at their respective telephone numbers listed below.

Sincerely,



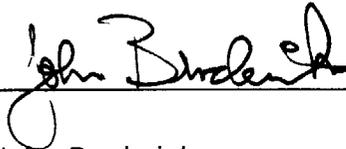
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