

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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March 27, 1995

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

**REVIEW COMMENTS ON THE DRAFT INVESTIGATION DERIVED WASTE
MANAGEMENT PLAN (IDWMP), MARINE CORPS AIR STATION EL TORO**

The Department of Toxic Substances Control (Department) and the California Regional Water Quality Control Board (RWQCB) have completed their review of the IDW MP. General and specific comments are enclosed.

Overall the plan is well written and concise. The Department is available for a comment resolution meeting either in person or via a telephone conference as necessary.

We look forward to working with you on these and other issues. Feel free to contact me at (310) 590-4919.

Sincerely,

Juan M. Jimenez
Remedial Project Manager
Region 4 - Base Closure Unit
Office of Military Facilities

Enclosures

cc: Ms. Bonnie Arthur
U. S. Environmental Protection Agency
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San Francisco, California 94105-3901

Mr. Joseph Joyce
March 27, 1995
Page 2

Mr. Lawrence Vitale
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California Regional Water Quality Control Board
Santa Ana Region
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Mr. Jason Ashman
Department of the Navy
Naval Facilities Engineering Command
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1220 Pacific Highway, Room 18
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Mr. David Cowser
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Mr. Vish Parprianni
Environmental and Safety
Marine Corps Air Station-El Toro
P. O. Box 95001
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**Draft Investigation
Derived Waste Management Plan for Phase II RI/FS
Marine Corps Air Station El Toro**

General Comments:

1. Mr. Larry Vitale of the Regional Water Quality Control Board, Santa Ana Board has provided comments. They will be forwarded as an enclosure.
2. The Department is concerned over the potential conflict associated with the storage of IDW for an unspecified time period so that it can be addressed with the final remedy and 90 day storage requirement which all generators have to deal with . The Navy/Marines have to comply with laws and regulations which are substantive and may follow guidance as appropriate. (See CCR, Tittle 22, Division 4.5, Chapter 10 et.al., as applicable.)

Specific Comments:

1. Pg. 1-2, Figure 1-1

The figures as provided, do not have scales. Please provide.

2. Pg. 3-3, para.3

See Mr. Vitales first comment.

Section 4 WASTE CHARACTERIZATION

3. Pg. 4-1

The second bullet item on this page refers to "Decontamination water from cleaning drilling equipment." However, the associated text addresses the results of analysis for soil samples collected from boreholes/wells... Since waste soil samples are addressed in the first bullet item, I presume you mean water samples. Please correct.

4. Pg. 4-1

The third bullet item refers to both "Waste sediments/decontamination water..." However, the text does not seem to address decontamination water from vibracore activities. Please revise the text so that it clearly demonstrates that this bullet item addresses waste characterization for both sediments and decontamination water .

5. Pg.4-1

The last paragraph mentions that " Representative samples may also be collected from the waste liquids generated during decontamination of soil gas probes and" The text should be expanded to state the criteria which will be used and the decision maker identified, in advance, as to when these "Representative samples" should be taken and who will make the call. I presume that the call be done in the field and documented in some form or another. Lets discuss the details.

Section 5 WASTE CLASSIFICATION

6 Pg. 5-1

The first paragraph in Section 5.1, lines 2-4 contradicts the first sentence of paragraph 1. Either all the federal, state and base regulations for classifications of waste will be applicable, i.e., IDW will be defined as hazardous under the criteria of ignitability, corrosivity, or reactivity period, if they are applicable or they will not be. If the criteria applies in general it also applies to soil cuttings and well development water. The criteria applies. Please revise lines 2-4 of paragraph 1 in section 5.1 to state this.

7 Pg. 5-2

Paragraph is entitled "Designated and Nonhazardous Waste" It may be inappropriate to classify and label wastes as designated. It may be classified as a special waste, if applicable, per CCR, Tittle 22, Division 4.5, Article 4.5 by following the requirements in Article 5, Section 66261. et. al. Lets discuss. See Mr. Vitales comment as well.

Section 6 WASTE HANDLING AND DISPOSAL

8. Pg. 6-1

It is the Departments understanding that all non hazardous wastes are being addressed in less than 90 days. The first paragraph states that " The wastes transferred to the facility are to be stored until final treatment and disposal alternatives for soils remediation have been evaluated." There is clearly a disconnect here. The hazardous or as it is referred to in the text "designated" wastes which are being stored in the south half of the facility have exceeded their 90 day storage limit. These inappropriately designated hazardous wastes have to move as soon as possible. There are a number of reasons for this:

- 1) Wastes which have regulatory requirements have to be dealt with in the time frames prescribed in the same manner by all generators.

- 2) There is a considerable time difference between implementation of the Phase II Workplan and the Final Record of Decision is reached, at which time the final treatment and disposal alternatives for soils remediation will be potentially addressed. This large difference in time does not allow for a timely follow through for implementation of the generator requirements.
- 3) If the Navy or any Potentially Responsible Party, PRP, for that matter were investigating a site with little potential for hazardous wastes, in the Site Inspection phase for instance, the IDW materials could be presumed to be nonhazardous due to the lack of evidence. In this case, however, the sites being investigated are presumed or documented to have had a release or a threat of release. As such they have to be handled as hazardous until the sample results show them to be nonhazardous. Keep in mind that this Phase II Work Plan is written to determine extent of contamination.

Please revise section 6 as appropriate.

How can the 50 cubic yards be dealt with in near future? Is it possible to include these wastes with the proposed Removal Actions? Lets discuss.

- 9 Pg. 6-5
See previous comments on storage of wastes. The IDW containing wastes should be labeled as hazardous until such time as they are no longer considered hazardous. This can occur by sampling results, treatment or some other acceptable manner.
- 10 Pg. 6-7
Please revise Figure 6-4 as follows:
 - 1) For the wastes which require treatment, post treatment should have an arrow/option to go through the currently designated waste decision box. I.e., if it is treated sufficiently it no longer has to go to an expensive Class I landfill.
 - 2) Is there an option to treat designated waste? If so can the treated waste be treated sufficiently to be addressed as non hazardous? These options should be included in Figure 6-3.

Mr. Joseph Joyce
March 27, 1995
Page 4

- 3) See previous comments on the use of the term Designated Waste.
 - 4) There may be additional options for Non hazardous solid waste and/or treated wastes. Lets discuss
11. Pg. 6-9
Please add section 6.3.7 with the heading of Treated Waste. This section should identify the options for treated waste streams.

Thank you for the opportunity to review this document.

Memorandum

To: Mr. Juan Jimenez **Date:** February 8, 1995
Department of Toxic Substances Control
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Long Beach, CA 90802-4444

From: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SANTA ANA REGION
2010 IOWA AVENUE, SUITE 100, RIVERSIDE, CALIFORNIA 92507-2409
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Subject: Draft Investigation Derived Waste Management Plan Marine Corps
Air Station El Toro

We have reviewed the subject document dated January 19, 1995 and received by us on January 30, 1995. As a result of our review we have the following comments for inclusion with other CAL/EPA comments for submittal to the Navy.

SECTION 3 REGULATORY CRITERIA

Page 3-3 Petroleum Hydrocarbon-Contaminated Soil

The first sentence of the second paragraph, regarding no specific guidelines or requirements concerning soil contaminated with petroleum hydrocarbons (TPH), should be deleted. There are guidelines and requirements regarding TPH soil contamination based on site specific conditions. These requirements are based on, contaminant nature, depth to groundwater or distance to surface water, lithology, stratigraphy, surface features and other groundwater characteristics. Some of the guidance and regulatory documents include; Leaking Underground Fuel Tank Guidelines, Title 23 California Code of Regulations, Chapter 16, Underground Storage Tank Regulations, and the Designated Level Methodology, for waste classification and cleanup level determination.

Page 3-4, Figure 3-2

Another choice for petroleum hydrocarbon (TPH) contaminated soil disposal, for soils with TPH concentration above 100 mg/kg, could be disposal at one of the Base landfills, if sufficient water quality protection is provided.

SECTION 5 WASTE CLASSIFICATION

Page 5-2, 5.2 Designated and Nonhazardous Waste

It may be inaccurate to label drums as Designated waste. Title 23 California Code of Regulations, Chapter 16, Section 2522 Designated Waste, defines a Designated waste as, "nonhazardous waste which consists of or contains pollutants which under ambient environmental conditions in the waste management unit could be released at concentrations in excess of applicable water quality objectives, or which could cause degradation of waters of the state". Therefore, in order to classify a waste as Designated you must know where the waste will be disposed and what the water quality objectives for the disposal location are. It would be more appropriate to label the waste drums as either hazardous waste or nonhazardous and determine if the waste is Designated when the disposal location has been determined.

If you have any questions please call me at (909)782-4998.



Lawrence Vitale
DoD Section