



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
1235 MISSION STREET
SAN FRANCISCO, CA 94103**

Agenda
June 25, 1990
MCAS El Toro FFA Negotiations
Technical Appendices and Attachments

1. Introductions/Opening Remarks
Summarize issues of June 13, 1990 Meeting
2. Discussion of operable units
Groundwater
Prioritization of Sites to be Investigated
3. Discussion of potential removals
OCWD Extraction Well
4. Review of Appendices and Attachments
Schedule *relate more to FY starts! EFD doing a GANT chart.*
Items in Workplan
All Operable Units in one overall Workplan
Maps *(what is the site?)*
Chemicals of Concern Preamble
Statement of Facts
Discussion of Sites
Addition of Sewer Survey
Addition of RWQCB Sites in separate Attachment
5. RCRA/CERCLA Integration
All Toxic Waste Releases in FFA
Closures in FFA
 No RCRA Permitted Sites on Base *NO! USMC TSD + open burning, etc.*
 No TPCA Sites on Base *YES*
6. Underground Storage Tanks
Hazardous Substance Tanks in FFA
Pure Petroleum Tanks to be referenced in FFA *} legal issue*
7. Funding
8. Summarize areas of agreement and further action items
9. Schedule next negotiation session

EPA/regulator will give counter proposal to schedule. → OU3/RWQCB list

MCAS EL TORO FFA MTG.
(25 JUNE 90)

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ATTACHMENT D

LIST OF SITES PROPOSED FOR PA/SIS (003?)

For the purposes of this agreement, the following is a listing of sites where preliminary assessment/soil investigations should be performed to determine whether any individual site is suitable for addition to the RI/FS site listing. This list may be added to upon the finding of additional information which suggests that possible discharges may have occurred at additional sites.

1. Engine Test Cell 658 and 447
2. Hanger 114 Aircraft Wash Area
3. Hanger 297 Aircraft Wash Area and Drum Storage
4. Hanger 461 Aircraft Wash Area
5. Hanger 463 Aircraft Wash Area
6. Hanger 605 Aircraft Wash Area
7. Hanger 606 Aircraft Wash Area
8. Bldg. 103 Paint Shed
9. Bldg. 127 Wash Rack
10. Bldg. 130 Drum Storage
11. Bldg. 262 Wash Rack
12. Bldg. 298 Maintenance Shop
13. Bldg. 317 Drum Storage
14. Bldg. 320 Trichloroethylene Drum Storage
(unnumbered site)
15. Bldg. 357 Drum Storage
16. Bldg. 359 Drum Storage, Wash Areas
17. Bldg. 386 Steam Cleaning Area
18. Bldg. 388 Wash Rack

19. Bldg. 390 Wash Rack
20. Bldg. 392 Wash Rack, Drum Storage Area
21. Bldg. 454 Drum Storage
22. Bldg. 456 Drum Storage
23. Bldg. 534 Drum Storage
24. Bldg. 602 Drum Storage
25. Bldg. 626 Wash Rack (unnumbered site)
26. Bldg. 651 Wash Areas
27. Bldg. 655 Drum Storage
28. Bldg. 673 Wash Rack, Drum Storage
29. Empty or Destroyed Bldgs. 143, 343, and 1789
30. Exchange Car Wash
31. Combat Ready Vehicle Storage and Wash Area
32. Heavy Equipment Vehicle Wash Area
33. Auto Hobby Shop - Leaking Waste Oil Tank (*site 20?*)
34. Mag. 13 Paint Sheds
35. Salvage Yard Drum Storage

Within thirty (30) days of the date of signing of this agreement, the Navy shall submit a proposed timeframe for the commencement and completion the preliminary assessments on the above listed sites. Within fifteen (15) days of receipt, EPA and the State shall review and provide comments to the Navy regarding the proposed timeframe. Upon completion and review of the preliminary assessments, the Parties shall meet as necessary to discuss the findings and the need for either additional soil investigation work or the elevation of the site to the RI/FS site listing.

Julie - what kinds of work plans should they need it.

*RFI - RCRA / PA (Prelim Ass under RCRA) (FAC ASS)
 - RFI would be an appendix to the RI/FS work plan (not NOV 90 DOC)*

22 JUNE 1990

OPERABLE UNITS CONSIDERED AT MCAS EL TORO

OPERABLE UNIT #1

SITE 18 - REGIONAL GROUNDWATER VOC INVESTIGATION *oc relationship*

OPERABLE UNIT #2 *(all closed)*

- SITE 2 - MAGAZINE ROAD LANDFILL
- SITE 3 - ORIGINAL LANDFILL
- SITE 5 - PERIMETER ROAD LANDFILL
- SITE 17 - COMMUNICATION STATION LANDFILL
- SITE 10 - PETROLEUM DISPOSAL AREA

OPERABLE UNIT #3

- SITE 1 - EXPLOSIVE ORDNANCE DISPOSAL RANGE
- SITE 4 - FERROCENE SPILL AREA
- SITE 6 - DROP TANK DRAINAGE AREA NO. 1
- SITE 7 - DROP TANK DRAINAGE AREA NO. 2
- SITE 8 - DPDO STORAGE YARD ✓
- SITE 9 - CRASH CREW PIT NO. 1 ✓
- SITE 11 - TRANSFORMER STORAGE AREA
- SITE 12 - SLUDGE DRYING BEDS ✓
- SITE 13 - OIL CHANGE AREA
- SITE 14 - BATTERY ACID DISPOSAL AREA
- SITE 15 - SUSPENDED FUEL TANKS
- SITE 16 - CRASH CREW PIT NO. 2 ✓
- SITE 19 - ACER SITE
- SITE 20 - HOBBY SHOP
- SITE 21 - MATERIAL MANAGEMENT GROUP, BUILDING 320 ✓
- SITE 22 - TACTICAL AIR FUEL DISPENSING SYSTEM

*note: reevaluate 20#3
sites for possible TCE
sources.*

OPERABLE UNIT #4

SITE 23 - ABANDON WASTE WATER PLANT RECEIVING LINES

22 JUN 1990

GENERAL INFORMATION:

1. A WORK PLAN WILL BE PRESENTED FOR OPERABLE UNITS 1, 2 AND 3 UNDER ONE COVER THE WORK PLAN FOR OPERABLE UNIT 4 WILL BE SUBMITTED AS A SEPERATE DOCUMENT.
2. WORK PLAN WILL IDENTIFY PHASES WITHIN THE RI/FS FOR EACH OPERABLE UNIT.
3. GROUPING OF SITES INTO OPERABLE UNITS - RATIONAL FOR THE SELECTION OF OPERABLE UNITS IS AS FOLLOWS:
 - o OU 1 INCLUDES TCE GROUNDWATER CONTAMINATION BOTH ON AND OFF-STATION. AT THIS TIME TCE HAS BEEN IDENTIFIED IN THE NEAR SURFACE GROUNDWATER UNDER MCAS EL TORO AND IN THE DEEP AQUIFER DOWN GRADIENT OF THE FACILITY.
 - o OU 2 POSSIBLE TCE SOURCE AREAS INCLUDING THREE LANDFILLS AND A PETROLEUM DISPOSAL AREA. ONE OTHER LANDFILL WAS INCORPORATED TO KEEP ALL LANDFILLS WITHIN THE SAME OPERABLE UNIT.
 - o OU 3 CONSISTS OF THE REMAINING 16 SITES NOT ADDRESSED IN UO'S 1, 2 OR 4. THESE SITES GENERALLY ADDRESS GROUNDWATER PROBLEMS AS A SECONDARY ISSUE. PRIMARY CONCERNS AT THESE SITES INVOLVE SOIL AND SEDIMENT CONTAMINATION.
 - o OU 4 INCLUDES ALL UNDERGROUND PIPING ASSOCIATED WITH THE WASTE WATER TREATMENT PLANT (SITE 23) AT MCAS EL TORO. AT THIS TIME NO INFORMATION HAS BEEN COLLECTED ON THIS SITE.
4. FUNDING BY YEAR OR PHASE - FUNDING FOR THIS PROJECT WILL BE BY YEAR.
5. ARE ALL SITES COVERED UNDER CERCLA OR RCRA - ALL 23 OF THE IDENTIFIED SITES FALL UNDER CERCLA.
6. UNDERGROUND TANK PROBLEMS - ONE UNDERGROUND STORAGE TANK ASSOCIATED WITH SITE 20 THE HOBBY SHOP. THIS TANK CONTAINS USED OIL FROM PERSONAL TRUCKS AND AUTOS.
7. RADIATION PROBLEMS - SITE 1 HAS UNSUBSTANTIATED REPORTS THAT A PORTION OF THE SITE WAS USED TO DISPOSE OF LOW-LEVEL RADIOACTIVE MATERIAL.
8. ANY RCRA CORRECTIVE ACTION SITES - NO.
9. RCRA PERMITS - MCAS EL TORO HAS PENDING PART A AND PART B APPLICATIONS FOR PERMITS. THESE INVOLVE DRMO STORAGE FOR MORE THAN 90 DAYS AND A CLOSURE PLAN FOR HAZARDOUS WASTE STORAGE CASES.

monthly RPR meetings
all PRP's and members of the TRC
22 JUN 1990

POTENTIAL REMOVAL

1. AT THE PRESENT TIME VERY LITTLE INFORMATION EXISTS FOR 21 OF THE 23 SITES, THEREFORE THE IDENTIFICATION OF ALL REMOVAL ACTIONS IS SOMEWHAT PREMATURE. OF THE TWO SITES WITH SOME HISTORICAL DATA, SITE 18 HAS THE LARGEST VOLUME OF SITE SPECIFIC INFORMATION. MUCH OF THIS DATA HAS COME FROM ORANGE COUNTY WATER DISTRICT.

DATA FROM THESE WELLS WILL BE SUBJECT TO THE ACCEPTANCE OF EPA, CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD AND THE UNITED STATES MARINE CORPS. IT IS OUR INTENSION TO USE AS MUCH OF THIS DATA AS POSSIBLE.

THE AREA ASSOCIATED WITH THE TCE CONTAMINATION (AS PROJECTED BY ORANGE COUNTY WATER DISTRICT) REQUIRES ADDITIONAL MONITORING SITES TO PRODUCE A CLEAR PICTURE AS TO THE HORIZONTAL AND VERTICAL EXTENT OF CONTAMINATION.

SITE 18 - THE TCE GROUNDWATER CONTAMINATION ON AND AROUND MCAS EL TORO PRESENTS A POTENTIAL REMOVAL ACTION. AFTER THE MONITORING NETWORK HAS BEEN ESTABLISHED BY MCAS EL TORO AND ADEQUATE INFORMATION COMPILED AND ANALYZED AN ENGINEERING EFFORT FOR A REMOVAL ACTION MAY BEGIN.

PROPOSED SCHEDULE

ENGINEERING EVALUATION/ COST ANALYSIS (EE/CA) START	JAN. 1991
DRAFT EE/CA	SEP. 1991
ACTION MEMORANDUM	NOV. 1991
IMPLEMENTATION OF REMOVAL ACTION	MAR. 1992

Final critical? (w/d) "can't get clean" in current config. note: OC has a well in work in plans to S(w) of MCAS - have not submitted WP to RWQCB yet - want to come to table it over? - status of PRP's in FFA? - def of site in FFA?

(F792#)

- RWQCB wants some to start pumping existing 4 mon. wells [Treatability study?]
- build rationale for int. removal into work plan (Julie A) [table above I rem.]

2. THE SECOND SITE THAT HAS HISTORICAL INFORMATION IS THE SITE 19, THE ACER SITE. THIS SITE INVOLVED A SPILL AND HISTORIC LEAKING FROM ABOVE GROUND FUEL BLADDERS. AFTER A SPILL IN 1986 THE SOIL WAS EXCAVATED TO A DEPTH OF 15 FEET OVER A 30-FOOT-SQUARE AREA AND DISPOSED OF IN A CLASS 1 LANDFILL. AT THIS TIME NO REMOVAL ACTION IS PLANNED FOR SITE 19.

3. LIMITED INFORMATION EXISTS AT SITE 4 (A FERROCENE SPILL) AND SITE 8 (A PCB OIL LEAK). IN BOTH CASES THE CONTAMINATED SOIL WAS PROMPTLY REMOVED. THESE SITES SHALL BE INCLUDED IN OPERABLE UNIT 3 FOR STUDY BUT NO REMOVAL ACTION IS FORESEEN.

4. THE REMAINING SITES HAVE VERY LIMITED DATA USUALLY CONSISTING OF RECORD SEARCHES AND INTERVIEWS. AT PRESENT, NO REMOVAL ACTIONS ASSOCIATED WITH THESE SITES ARE PLANNED.

22 JUN 1990

THE UNDERGROUND STORAGE TANK PROGRAM AT MCAS EL TORO

MONITORING PROGRAM - A MONITORING PROGRAM IS BEING DEVELOPED TO MONITOR THE OPERATIONAL UNDERGROUND STORAGE TANKS (USTs) IN ACCORDANCE WITH REGULATIONS PRIOR TO PERMITTING WITH ORANGE COUNTY HEALTH CARE AGENCY. THIS IS A THREE STEP OPERATION.

STEP 1 REQUIRES THE PRECISION TESTING AND MONITORING SYSTEM INSTALLATION ON ALL OPERATIONAL TANKS. AT THIS TIME THE PRECISION TESTING IS COMPLETE. THE ACTIVITY IS CURRENTLY REPAIRING 7 FAILED TANKS (now in Step 3) AND THESE TANKS WILL BE RE-TESTED AND CERTIFIED OPERATIONAL UPON PASSING.

STEP 2 INVOLVES THE REMOVAL OF ABANDON TANKS. THERE ARE 274 KNOWN ABANDON TANKS AT MCAS EL TORO. THE REMOVAL OF THESE TANKS IS EXPECTED TO BEGIN LATE IN 1991. THE REMOVAL OF THESE ABANDON TANKS WILL BE COMPLETED IN PHASES, POSSIBLY 10 TO 20 TANKS PER PHASE AS FUNDING ALLOWS.

STEP 3 IS THE LEAKING TANK PROGRAM WHICH 7 TANKS ARE CURRENTLY INVOLVED. THIS STEP ALLOWS FOR THE REPAIR AND CLEANUP OF LEAKING TANKS AND EVENTUALLY THE RE-TESTING AND MONITORING SYSTEM INSTALLATION.

TANK 398 - UPON TESTING TANK 398 A LEAKING PIPE WAS DETECTED. THIS TANK WAS MOVED INTO THE LEAKING TANK PROGRAM (step 3) AND A SITE CHARACTERIZATION STUDY BEGAN. THE SITE CHARACTERIZATION WORK IS NOW COMPLETE AND THE FINAL REPORT SUBMITTED TO SOUTHWESTDIV AND THE ACTIVITY. REVIEW OF THE FINAL REPORT IS NOT YET COMPLETE, HOWEVER, INITIAL INDICATIONS ARE THAT THERE IS SIGNIFICANT CONTAMINATION IN THE SOIL AT THE TANK SITE AND FREE FLOATING PRODUCT WAS DISCOVERED ON THE GROUNDWATER. THE NEXT PHASE FOR THIS SITE WILL BE TO DEVELOP A REMEDIATION PLAN ADDRESSING THE CLEAN UP ACTIONS REQUIRED BASED ON THE RESULTS OF THE CHARACTERIZATION STUDY.

AT THIS TIME AN INVENTORY OF TANKS AS TO THEIR APPLICABILITY TO THE CERCLA IS NOT COMPLETE.

DRAFT

22 JUN 1990

PROPOSED SCHEDULE

MILESTONES

	<u>OU 1&2</u>	<u>OU 3</u>	<u>OU 4</u>
FINAL WORK PLAN (approved by Regs)	NOV. 1990	NOV. 1990	DEC. 1992
WORK PLAN IMPLEMENTATION START	JAN. 1991	MAY. 1992 DCT 91 (PAUSE)	SEP. 1993
DRAFT RI REPORT	FEB. 1992	JUN. 1993	OCT. 1994
DRAFT FS REPORT	JUN. 1992	OCT. 1993	FEB. 1995
PROPOSED PLAN	SEP. 1992	JAN. 1994	MAY. 1995
DRAFT RECORD OF DECISION	DEC. 1992	APR. 1994	AUG. 1995
ROD SIGNATURE	FEB. 1993	JUN. 1994	NOV. 1995
PRE. REMEDIAL DESIGN	NOV. 1993	MAR. 1995	AUG. 1996
FINAL REMEDIAL DESIGN	MAY. 1994	SEP. 1995	FEB. 1997
CONTRACT AWARD	JAN. 1995	MAY. 1996	NOV. 1997
CONSTRUCTION START	FEB. 1995	JUN. 1996	DEC. 1997

CF study 1 *

- EPA would like
DRA budget
- May get OU 3
moved up to
beginning 7FY

ADDITIONAL SITES

THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD (RWQCB) REQUESTED ON 23 JUNE 1989, THAT APPROXIMATELY 14 ADDITIONAL SITES BE INVESTIGATED FOR POSSIBLE INCLUSION IN THE IR PROGRAM. TWO OF THESE SITES HAVE BEEN ADDED TO THE CURRENT LIST TO BE STUDIED IN OPERABLE UNIT 3. THE REMAINING 12 SITES REQUESTED BY RWQCB ARE TO BE EVALUATED SEPARATELY TO DETERMINE IF A RELEASE HAS OCCURRED. IF A RELEASE HAS OCCURRED AT ANY OF THESE SITES THEY WILL BE INCLUDED INTO THE IR PROGRAM. AT THIS TIME THE WASH AREAS OF CONCERN TO RWQCB NEED TO BE IDENTIFIED. THE FOLLOWING IS A LIST OF THE REQUESTED INCLUSION SITES AS RECEIVE FROM RWQCB:

- o CORROSION CONTROL FACILITY (BLD. 359)
- o ENGINE TEST CELL (BLD. 658)
- o ENGINE TEST CELL (BLD. 447)
- o ENGINE TEST CELL (BLD. 324)
- o SOLVENT STORAGE (BLD. 392)
- o SOLVENT STORAGE (BLD. 602)
- o SOLVENT STORAGE (BETWEEN BLD. 454 & 456)
- o SOLVENT STORAGE (BLD. 317)
- o SOLVENT STORAGE (BLD. 359)
- o HAZARDOUS AND FLAMMABLE MATERIALS STOREHOUSE (BLD. 357)
- o OIL/WATER SEPARATOR AT BEE CANYON WASH
- o OIL/WATER SEPARATOR AT AGUA CHINON WASH

* incl OU 3 and RWQCB list (att added)