



**COUNTY OF ORANGE
HEALTH CARE AGENCY**

**REGULATORY HEALTH SERVICES
ENVIRONMENTAL HEALTH**

M60050_002761
MCAS EL TORO
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May 28, 2002

Ms. Lynn Hornecker
Remedial Project Engineer
Naval Facilities Engineering Command
Southwest Division – Code 5BME.LH
1220 Pacific Highway
San Diego, CA 92132-5187

Subject: Abandonment of Underground Storage Tanks

**RE: Marine Corps Air Station El Toro
Tank Farm #555
Santa Ana, CA 92709**

Dear Ms. Hornecker:

This is a follow up letter on your request to abandon the tanks at the above referenced site. In a letter addressed to Dean Gould of your office dated August 14, 2000, this Agency had indicated that assessment was necessary to determine whether there had been an unauthorized release from these tanks. It also indicated that if there were a release, authorization to abandon the tanks would depend on concurrence by the regulatory agency overseeing corrective action activities. Should the overseeing agency believe that tank abandonment would interfere with necessary corrective action activities, abandonment would not be approved.

During a phone conversation on May 24, 2002, you indicated that an unauthorized release had occurred at the site and that the Santa Ana Regional Water Quality Control Board (SARWQCB) has been overseeing remedial pilot tests. Therefore, assessment to determine the occurrence of an unauthorized release is no longer necessary. However, this Agency must still obtain concurrence from the SARWQCB that the abandonment of tanks will not interfere with future corrective action activities. A letter requesting concurrence will be sent.

Should concurrence come from the SARWQCB, you must obtain a permit from the Orange County Fire Authority or other appropriate city Fire Department to abandon the tanks in place and also comply with the requirements in sections 2 through 4 in the attached guideline prior to receiving final approval from this Agency.

Lynn Hornecker

May 28, 2002

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If you have any questions, please call me at (714) 667-3713.

Sincerely,

A handwritten signature in black ink that reads "Arghavan Rashidi-Fard". The signature is written in a cursive style with a large initial 'A'.

Arghavan Rashidi-Fard

Hazardous Waste Specialist

Hazardous Materials Mitigation Section

Environmental Health

Attachment

cc: George Turner, Deputy District Attorney
Polin Modanlou



HEALTH CARE AGENCY ENVIRONMENTAL HEALTH

GUIDELINES FOR THE ABANDONMENT IN PLACE OF AN UNDERGROUND STORAGE TANK

The applicant must notify and obtain approval from the local fire department prior to initiating an application for abandonment in place of an underground storage tank with the Environmental Health Division.

After approval has been obtained from the local fire department, a Facility Modification Application and plans must be submitted to Environmental Health. Applications may be obtained in person, or by calling Environmental Health at (714) 667-3600.

1. Applicant submits Facility Modification Application, four sets of plans and closure fee to Environmental Health at the above address. Plans must include:
 - a) Site location and plot plan identifying all existing structures, underground storage tanks and piping.
 - b) The size of the underground storage tanks to be abandoned, length of piping, and the types of hazardous substances which have been stored in the tanks.
 - c) Indicate: (1) the location(s) of the boring(s) used to collect required soil and if present, groundwater samples; (2) the boring method (e.g., slant, hollow stem auger etc.); (3) the number of samples; (4) the sampling intervals and depth; and (5) the approved EPA methods to be used to analyze the samples collected.

Environmental Health will review and either approve or deny the application and plans.

2. Applicant must apply for permits from city or County Fire Department, city or County Building Department, and the South Coast Air Quality Management District (SCAQMD) (if applicable) for their approval.
3. Applicant must provide 48 hours notice to Environmental Health and city or County Fire Department for an on-site inspection of the tank abandonment and soil sampling.
4. Owners of underground storage tanks proposing to abandon the underground tank shall comply with all applicable provisions of Chapter 6.7 of Division 20 of the Health and Safety Code and the following:
 - a) All residual liquid, solids, or sludges from the underground storage tank shall be removed and disposed of as hazardous waste. A copy of all uniform hazardous waste manifests used for the disposal shall be forwarded to Environmental Health after they have been signed by the receiving State permitted hazardous waste disposal facility.

- b) If the underground storage tank contained a hazardous substance that could produce flammable vapors at standard temperature and pressure, then the underground storage tank shall be inerted to levels that shall preclude explosion or such lower levels as may be required by the local fire department. (Note: A representative from the appropriate fire department must be present prior to initiating this procedure.)
 - c) All piping associated with the underground storage tank shall be removed and disposed of unless removal might damage structures or other pipes that are being used and that are contained in a common trench, in which case the piping to the closed shall be emptied of all contents and capped.
 - d) The underground storage tank shall be completely filled with an inert solid approved by the local fire department.
 - e) Applicant must provide 48 hours notice to Environmental Health and city or County Fire Department for an on-site inspection of the tank abandonment and soil sampling.
5. The owner of the underground storage tank(s) being closed shall demonstrate to the satisfaction of Environmental Health that no unauthorized release has occurred. This demonstration shall be achieved by obtaining soil and groundwater samples, if groundwater is present, from boring made beneath the tank in accordance with Section 2672(d)(2), of Title 23, CCR. The soil borings and sampling must be witnessed by Environmental Health staff. Soil and groundwater samples shall be analyzed, at the owner's expense, for the substances and constituents previously stored in the tank. A copy of the soil and groundwater analysis report should be forwarded directly to Environmental Health. The laboratory analysis must include a statement certifying that the samples were received on the same day sampled, in a chilled state, and that the County seals on the sample containers were intact.
- NOTE: If the depth to groundwater is less than 20 feet, then a groundwater monitoring well shall be installed in accordance with Sections 2648 and 2649 of Title 23, CCR adjacent to the tank and/or piping in the verified downgradient direction. The location, depth and well construction information must be identified on the plans.
6. The detection of an unauthorized release, based on field observations and/or the results of the soil and groundwater analysis, will require compliance with the reporting requirements of Article 5 of Title 23, CCR.

The abandonment is completed only after successful compliance with the above requirements.

If you have any questions or need additional information please contact the Underground Storage Tank Program at (714) 667-3600.

TRANSMITTAL

Date: 5 June 2002

From: Lynn Marie Hornecker *LMA*
MCAS El Toro

To: Diane Silva
Code ~~015.DS~~ Code 05G.DS

Subj: **CERCLA Administrative Record Materials**
Marine Corps Air Station, El Toro

Installation: Marine Corps Air Station, El Toro

UIC Number: M60050

Document Title (or subject): Abandonment of Underground Storage Tanks

Author: Arghavan Rashidi-Fard

Recipient: Lynn Hornecker, Navy OCHCA

Record Date: 28 May 2002

Approximate Number of Pages: 4

EPA Category: 01.1

Sites: Tank Farm 555

Key Words: UST Site Closure

Contract: N/A

CTO Number: N/A

Note: Tank Farm 555 is adjacent to IRP Site 17.