

# Former MCAS Tustin Fact Sheet

## Status of Installation Restoration Program

### Cleanup Activities at OU-1A/OU-1B and Arsenic AOC



February 2004

Tustin, California

#### Purpose of this Fact Sheet

The purpose is to provide information about proposed cleanup activities for the following environmental projects at Former MCAS Tustin:

- Operable Unit (OU)-1A and OU-1B—Due to changes in the soil disposal component for the preferred remedies for OU-1A and OU-1B, the Navy is providing the public with an opportunity to comment on the proposed changes (see pages 1 and 2).
- Arsenic Area of Concern (AOC)—an Engineering Evaluation/Cost Analysis (EE/CA) has been developed for a cleanup action to address elevated concentrations of arsenic in soil (see page 3). A public meeting is scheduled for Tuesday, February 24, 2004 to provide an opportunity to learn more about the EE/CA (see below).

#### 30-Day Public Comment Period and Public Meeting

##### PUBLIC COMMENT PERIOD

February 18–March 19, 2004

You are encouraged to comment on the OU-1A/OU-1B Soil Disposal Component Change and on the Arsenic AOC EE/CA during the public comment period. Comments can be provided via mail, e-mail, or fax (**postmarked no later than March 19, 2004**) to: Base Realignment and Closure, Attn: Jerry Dunaway, MCAS Tustin, BRAC Environmental Coordinator, 7040 Trabuco Road, Irvine, CA 92618-1700; by fax (949) 726-6586; by e-mail [jerry.dunaway@navy.mil](mailto:jerry.dunaway@navy.mil). Comments on the Arsenic AOC EE/CA can also be submitted at the public meeting (see below). A Responsiveness Summary will be prepared for all comments received during the public comment period.

##### PUBLIC MEETINGS—Arsenic AOC and Restoration Advisory Board (RAB)

February 24, 2004, 7 to 9 p.m.

##### LOCATION

Tustin City Hall  
300 Centennial Way, Tustin, CA

Navy representatives will first make a presentation on the Arsenic AOC and the cleanup alternatives evaluated. You will have the opportunity to ask questions and formally comment orally or in writing on the Arsenic AOC EE/CA. The proposed change to the preferred remedies for OU-1A and OU-1B will then be presented at the RAB meeting held the same evening at the same location immediately following the public meeting. Formal oral and written comments will be taken on the disposal component change of the preferred remedies after the OU-1A/OU-1B presentation.

#### Navy Proposes to Change Soil Disposal Component

The Navy is proposing to change the soil disposal component of the groundwater cleanup projects at Operable Unit 1A (OU-1A) and OU-1B at Former Marine Corps Air Station (MCAS) Tustin. The preferred remedies for OU-1A and OU-1B, Hydraulic Containment with Hot-spot Removal, includes excavation of contaminated soil to expedite the cleanup of groundwater. On-site thermal treatment of contaminated soil and reuse of treated, clean soil was presented in both Proposed Plans as a component of the preferred remedies for the disposal of the excavated soil. Based on information obtained since the Proposed Plans were issued to the public in 2002 and 2003, this component for soil disposal was found to be unfeasible. Therefore, off-site disposal of contaminated soil has been selected as the soil disposal component for the preferred remedies at OU-1A and OU-1B.

#### BACKGROUND

Environmental investigations have been conducted at Installation Restoration Program (IRP) Sites 3 and 12 (under OU-1B), and 13S (under OU-1A) at Former MCAS Tustin to identify and investigate chemical contamination of soil and groundwater that resulted from past operations, and to evaluate human health risks and cleanup alternatives. Based on information obtained during these investigations, further cleanup actions were recommended for groundwater due to the potential human-health risk from exposure to contaminated groundwater. However, no further action for soil was recommended since exposure to the soil does not pose a risk to human health.

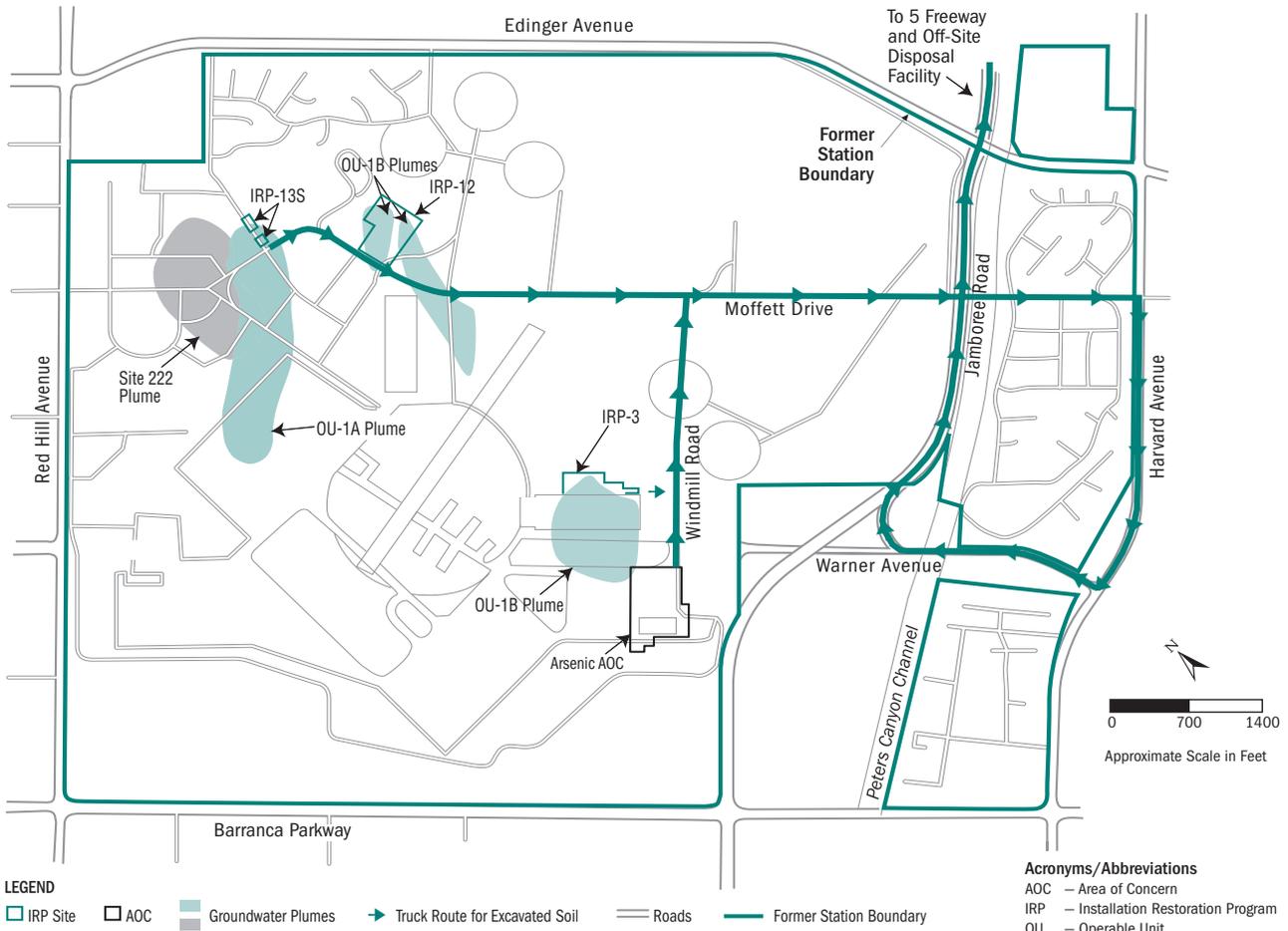
Cleanup alternatives for groundwater contamination at OU-1A and OU-1B were developed and fully evaluated during feasibility studies. Excavation of contaminated soils to reduce the overall time to conduct the groundwater cleanup was included as a component of several alternatives. Two viable disposal options for the excavated soils were identified in the feasibility studies: 1) on-site thermal treatment and reuse; and 2) off-site disposal. Both soil disposal options were included in alternatives that were further evaluated as possible remedies for groundwater cleanup.

#### THE PREFERRED REMEDY

The Marine Corps used results obtained during the Remedial Investigation and Feasibility Studies along with input from the public and regulatory agencies to select the preferred alternative, Hydraulic Containment with Hot-Spot Removal for Groundwater at OU-1A and OU-1B. This preferred remedy includes the following components:

- Hydraulic Containment of Groundwater Plumes
- Extraction of Hot-Spot Groundwater
- Treatment of Extracted Groundwater with Granular Activated Carbon
- Disposal of Treated Groundwater to Peters Canyon Channel, consistent with the Santa Ana Regional Water Quality Control Board (RWQCB) permit requirements
- Excavation of Hot-Spot Soils
- Disposal of Excavated Hot-Spot Soils (component change, see pages 2 and 3)
- Institutional Controls

**Figure 1 – Former MCAS Tustin – Location Map**



### CHANGE IN SOIL DISPOSAL COMPONENT

After the feasibility studies were completed and the preferred remedies were presented to the public in the Proposed Plans, additional information was obtained indicating that on-site thermal treatment and reuse was no longer a viable option for soil disposal. This option was determined to be unfeasible based on factors related to permitting of an on-site thermal treatment unit, utility connections, and additional treatment requirements. The Navy subsequently selected the off-site soil disposal option for the disposal of excavated hot-spot soils component of the preferred remedy.

### OFF-SITE DISPOSAL OPTION FOR EXCAVATED SOIL

The off-site disposal option consists of placing the excavated soil directly into hauling trucks for transport to an off-site permitted facility for disposal. Clean fill will be obtained from an off-site source to backfill the excavated areas. The Navy anticipates about 20 trucks a day will travel the truck route identified in Figure 1. This truck route is an established

truck route currently used by developers that avoids sensitive areas such as schools and residential areas. The total time to complete all soil excavation, disposal, and backfill activities at OU-1A and OU-1B is estimated to take approximately one month.

### SUMMARY AND RATIONALE

Since on-site thermal treatment of contaminated hot-spot soils and reuse of treated, clean soil is not a viable option for soil disposal at OU-1A and OU-1B, the Navy is proposing off-site disposal for excavated hot-spot soils. Off-site disposal of excavated hot-spot soils was determined to be a viable option as a new component of the preferred remedy based on the evaluation conducted in the feasibility studies. The truck route selected provides for a safe and effective approach for the off-site transport and disposal of contaminated soil. The Navy, the U.S. EPA, the California EPA, including both the Department of Toxic Substances Control and the Regional Water Quality Control Board, concur that the change in this component of the preferred remedy is appropriate and effective in meeting the goals for groundwater

**Figure 2 – Preferred Remedy Components**

Shown are the components of the preferred remedy. The component change for disposal of soil is highlighted.



**Arsenic AOC**

In May 2002, a Preliminary Assessment of the Arsenic AOC, located in the south-central area of Former MCAS Tustin, indicated that imported fill material used in construction of two buildings is the source of elevated concentrations of arsenic in soil. A risk assessment was conducted to determine if contaminants associated with the Arsenic AOC are a threat to human health and/or the environment. Based on the results of the Preliminary Assessment and the risk assessment, the Navy determined that a cleanup action is necessary to address the elevated concentrations of arsenic in soil.

A document referred to as an Engineering Evaluation/Cost Analysis (EE/CA) was prepared for the Arsenic AOC. Four cleanup alternatives were evaluated in the EE/CA to assess cleanup effectiveness, compliance with legal and regulatory requirements, ability to implement alternatives, and cost-effectiveness. Alternative 3, excavation of fill soil with off-site treatment and disposal was considered the most effective alternative for addressing soil with elevated concentrations of arsenic. It provides for long-term protection of human health and the environment, is relatively easy to implement, and provides the best balance between costs and overall effectiveness. The U.S. EPA and the California EPA, including both the Department of Toxic Substances (DTSC) and the Regional Water Quality Control Board concur with the selection of this cleanup alternative.

A public comment period and a public meeting are scheduled to provide the community with an opportunity to provide feedback on the EE/CA for the Arsenic AOC (see **30-Day Public Comment Period** on page 1). The Preliminary Assessment and the EE/CA documents for the Arsenic AOC are available at the Former MCAS Tustin Information Repository and Administrative Record (see back page).

In addition, DTSC has determined that the proposed soil excavation and disposal will not have a significant effect on the environment. Therefore, it is exempt from the detailed environmental analysis required by the California Environmental Quality Act (CEQA). DTSC prepared a "Notice of Exemption," documenting its decision for this project. DTSC's "Notice of Exemption" does not require formal public comments.

**FOR ADDITIONAL INFORMATION**

The Marine Corps encourages community involvement in the decision-making process of the environmental restoration program at Former MCAS Tustin. If you have any questions or concerns about environmental activities at Former MCAS Tustin, please feel free to contact any of the following project representatives:

**Mr. Jerry Dunaway**  
BRAC Environmental Coordinator  
MCAS Tustin Base Realignment and Closure  
7040 Trabuco Road, Irvine, CA 92618-1700  
(949) 726-5398 (619) 532-0975

**Mr. Tim Chauvel**  
Public Participation Specialist  
Cal/EPA, Dept. of Toxic Substances Control  
5796 Corporate Avenue, Cypress, CA 90630  
(714) 484-5487

**Ms. Viola Cooper**  
Community Involvement Coordinator  
Superfund Division, U.S. EPA  
Office of Hazardous Waste  
75 Hawthorne St. (SFD-3), San Francisco, CA 94105  
(800) 231-3075

**MAILING LIST COUPON**

If you would like to be on the mailing list to receive information about environmental restoration activities at Former MCAS Tustin, please complete this coupon and mail to: Base Realignment and Closure, Attn: Jerry Dunaway, BRAC Environmental Coordinator, MCAS Tustin, 7040 Trabuco Road, Irvine, CA 92618

Add me to the MCAS Tustin Installation Restoration Program mailing list.

Send me information on Restoration Advisory Board membership.

Remove me from your mailing list.

Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_ Zip Code \_\_\_\_\_

Affiliation (optional) \_\_\_\_\_

Telephone \_\_\_\_\_

## Administrative Record and Information Repository

**T**he collection of reports and historical documents used by the Marine Corps in the selection of cleanup or environmental management alternatives is the Administrative Record (AR). The AR file provides the key documents that provide a record of decisions and actions by the Marine Corps for the sites discussed in this Fact Sheet. Other supporting documents and data pertaining to these sites are also contained in the AR file.

### Administrative Record File Location:

The complete AR file is available for public review at Former MCAS El Toro. To arrange a time to review documents during the public comment period (February 18 to March 19, 2004), contact Ms. Marge Flesch at (949) 726-5398.

### Information Repository Location:

Community members can also find key supporting documents that pertain to the sites discussed in this Fact Sheet, and a complete index of all MCAS Tustin AR documents, at the Information Repository located at the University of California at Irvine Main Library, Government Publications Department. The telephone numbers are (949) 824-7362 or (949) 824-6836.

\*\*Further information on OU-1A and OU-1B can be found in the OU-1A Proposed Plan distributed in August 2003 and the OU-1B Proposed Plan distributed in April 2002. Copies of the OU-1A and OU-1B Proposed Plans will also be available at the February 24, 2004 RAB Meeting. Please contact Ms. Marge Flesch to request copies of the Proposed Plans.

---

Base Realignment and Closure  
Attn: Jerry Dunaway  
BRAC Environmental Coordinator  
MCAS Tustin  
7040 Trabuco Road  
Irvine, CA 92618-1700

---

Official Business  
Penalty for Private Use  
\$300

