

# NPL Partial Site Deletion Narrative

## El Toro Marine Corps Air Station Orange, California

On January 21, 2014, the EPA deleted a portion of the El Toro Marine Corps Air Station (El Toro MCAS) Superfund site, located in Irvine, CA, from the National Priorities List (NPL). This partial deletion applies to all site media, including soil and ground water, of parcels I-A, II-A, III-A, II-J, II-Q, II-S, II-T, III-C, I-C, II-U, I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, III-D, I-K, I-N, I-O, I-S, II-E, II-L, II-M, II-R, I-Q, I-R, II-B, II-K, and II-O of the site. The total partial deletion area includes 1,900.4 acres of contiguous property. The remaining areas of the site will remain on the NPL.

The former El Toro MCAS began in 1942 when a pilot fleet operational training facility was constructed on 2,319 acres. Between 1944 and 1986, additional land was acquired to bring the size of the installation to approximately 4,712 acres. Major activities at the site that contributed to the generation of hazardous waste included vehicle maintenance, ground support maintenance, aircraft maintenance, and aircraft corrosion control. The maintenance operations generated wastes including spent solvents and waste oils (including TCE, TCA, MEK, toluene, and PD-680), fuels, greases removed from the spent solvents, and spent strippers. Aircraft washrack activities resulted in discharge of alkaline soaps, detergents, and small amounts of PD-680.

Several potentially contaminated areas were identified on the site, including four landfills suspected of containing both hazardous and solid waste, and other areas where polychlorinated biphenyls (PCBs), battery acids, leaded fuels, and other hazardous substances were suspected of being dumped or spilled. A Remedial Investigation (RI) identified volatile organic compounds in ground water that migrated more than three miles off base. The primary source of the ground water contamination was two large aircraft hangars.

The site was decommissioned as an active base in July 1999. Recently, portions of the site have been transferred to different governmental agencies including 23 acres to the California Department of Transportation and 896.7 acres to the Federal Aviation Administration. The parcels being deleted from the NPL have all been transferred from the Department of the Navy (DON) to Heritage Fields LLC (Heritage Fields) under the Base Realignment and Closure Act of 1995. Heritage Fields plans to build a combination of residential, commercial, retail and educational facilities. In addition, Heritage Fields has transferred 1,387 acres to the city of Irvine to create the Orange County Great Park which will become a sports village and entertainment center, high school and elementary schools, and an expanded Irvine transportation center. Redevelopment efforts are on-going.

Environmental Baseline Surveys were completed in 1995 and 2003 and identified environmental factors and locations of concern (LOCs) where further evaluation and/or actions were ongoing or required. These LOCs were reviewed by the DON, state regulatory agencies and the EPA and either recommended for no further action (NFA) or for further sampling. Based upon the subsequent sampling, those sites either became NFA sites or proceeded to the CERCLA cleanup process. The DON was required to document that all environmental impacts associated with the DON's activities on the site had been thoroughly investigated and appropriate remedial actions have been taken to protect the public health, welfare, and the environment. The DON prepared a total of 7 Finding of Suitability to Transfer (FOST) documents to

describe the LOCs on the property to be transferred and the investigation and remedial actions taken at those properties.

LOC site narratives where release, disposal, and/or migration of hazardous substances occurred, but at concentrations that did not require a removal or remedial action because site conditions were found to be protective of both human health and the environment may be found in a tables appendix in the Deletion Docket. This appendix does not include LOCs that were only contaminated with petroleum, as these sites are not subject to CERCLA based on the petroleum exemption. In total, 112 such LOCs were thoroughly evaluated and recommended for no further action.

Approximately 2,798 acres of the site were covered by FOST 1; including 1,070.2 acres were not part of the NPL due to the determination that the area had not been impacted by hazardous waste. The portions of FOST 1 area that were on the NPL consisted of Transfer Parcels I-A, II-A and III-A. These parcels included buildings/structures/facilities, auto shop, and golf course. The human health and ecological risk assessments showed that the contaminants present did not present an unacceptable risk to human health or the environment. Therefore, no remedial action was required at Transfer Parcels I-A, II-A and III-A, and these areas are being deleted from the NPL.

Approximately 8 acres of El Toro MCAS were covered by FOST 2 consisting of Transfer Parcels II-J, II-Q, II-S, II-T, and III-C and a portion of Transfer Parcel II-Q. Transfer parcels II-J and II-Q did not contain any CERCLA LOCs. Transfer Parcel II-T was approximately 0.5 acres in size and contained one building/structure/facility. Transfer Parcel III-C was approximately 1 acre in size and contained one building/structure/facility. NFA determinations were made for all LOCs within Transfer Parcels II-T and III-C. Transfer Parcel II-S was approximately 1.3 acres in size and included six buildings/structures/facilities and one demolished building. Surface soils were moved from an area within Transfer Parcel II-S and no additional response actions were required at any of the areas covered by FOST 2 and COs II-J, II-Q, II-S, II-T and III-C are being deleted from the NPL.

Approximately 3.9 acres of El Toro MCAS were covered by FOST 3. This area consisted of two Transfer Parcels referred to as Carve-Outs (COs). CO I-C consisted of approximately 0.1 acre in the northeastern portion of the former base. This CO was created when a portion of an underground pipeline was believed to exist within this area. It was later determined that no portion of the pipeline was within Transfer Parcel I-C. CO II-U consisted of approximately 3.8 acres in the northeastern portion of the former base. A portion of the Norwalk-El Toro Pipeline was removed from CO II-U in the fall of 2006. No further action was necessary at COs I-C and II-U of FOST 3, and these areas are being deleted from the NPL.

Approximately 42.9 acres of El Toro MCAS were covered by FOST 4 consisting of thirteen COs: COs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, III-D. COs I-L, I-M, I-P, II-G, II-I and II-P. None of these areas contained LOCs so no RIs were conducted. No remedial action was required at COs I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, III-D, and these areas are being deleted from the NPL.

Approximately 119.3 acres of El Toro MCAS were covered by FOST 5 consisting of nine COs: COs I-F, I-K, I-N, I-O, I-S, II-E, II-L, II-M, II-R and CO Building 746. CO I-F is not part of the partial deletion area and will remain on the NPL. CO Building 746, located within CO II-D, is not part of the partial deletion area and will also remain on the NPL. COs I-K, I-N, I-O, I-S contained only petroleum LOCs or no release, disposal, and/or migration of hazardous substances occurred there. No RIs were conducted and no cleanup was required at COs II-E and II-M. CO II-L contained a portion of Installation Restoration Program Site 25; all other LOCs in CO II-L did not require cleanup. CO II-R is about 1.2 acres in size and located in the southeast portion of the former base. There was one pad-mounted transformer (PCB T74) at Building 457. Historically, disposal activities were conducted at this site, though the dates of these operations are

unknown. A response action was required for releases of transformer oil containing PCBs at Building 457 (RCRA Facility Assessment (RFA) Site 244). While no RIs were conducted under CERCLA, RFA Site 244/PCB T74 was evaluated under a RCRA Facility Assessment. A determination of NFA was made for RFA 244 and PCB T74. COs I-K, I-N, I-O, I-S, II-E, II-L, II-M, and II-R of FOST 5 are being deleted from the NPL.

Approximately 356.81 acres of El Toro MCAS were covered by FOST 6 consisting of eleven COs: COs I-D, I-Q, I-R, II-B, II-K, II-N, II-O, III-B-1, III-B-2, III-E, and III-F. COs I-Q and I-R contained only petroleum LOCs and were therefore subject to the CERCLA petroleum exclusion, or no release, disposal, and/or migration of hazardous substances occurred there. As a result, these COs are not discussed in this document. Additionally, COs I-D, II-N, III-B-1, III-B-2, III-E, and III-F are not part of this partial deletion request and will remain on the NPL. No remedial action was required at COs I-Q, I-R, II-B, II-K and II-O and these areas are being deleted from the NPL.

Approximately 151.06 acres of El Toro MCAS were covered by FOST 7. None of the areas within FOST 7 are included in this partial deletion.

No Five-Year Reviews are required at El Toro MCAS because the remediation of all site-related contamination has been such that restrictions on use and/or institutional controls were unnecessary. The EPA, with concurrence of the State of California through the Department of Toxic Substances Control, has determined that all appropriate response actions under CERCLA have been completed. Therefore, the EPA is deleting parcels I-A, II-A, III-A, II-J, II-Q, II-S, II-T, III-C, I-C, II-U, I-B, I-E, I-G, I-H, I-I, I-J, I-L, I-M, I-P, II-G, II-I, II-P, III-D, I-K, I-N, I-O, I-S, II-E, II-L, II-M, II-R, I-Q, I-R, II-B, II-K and II-O of the El Toro Marine Corp Air Station Site from the NPL.