

**NOTICE OF EXEMPTION**

To: Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044, 1400 Tenth Street, Room  
212  
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control  
Hazardous Waste Management Program  
1011 North Grandview Avenue  
Glendale, CA 91201

Project Title: Revised Closure Plan – Class 2 Permit Modification

Project Location: The Marine Corp Base Camp Pendleton (MCBCP) is located in the northwest portion of San Diego County, California, approximately 40 miles north of the City of San Diego. The Hazardous Waste Storage Unit is located in the southern part of MCBCP, named 24 Area.

County: Unincorporated San Diego

Project Description: The MCBCP operated a Hazardous Waste Management Unit that was permitted for the storage of containerized hazardous waste from onsite generated wastes. This unit named the Hazardous Waste Bunker Storage Facility (HWSF) is located in the 24 Area of the MCBCP.

The 24 Area HWSF consists of 13 bunkers, three large and five small International Standard Organization (ISO) containers, and four staging areas. The wastes generated and collected at the 24 Area HWSF consisted primarily of petroleum products including waste oil, contaminated soils, oily rags, solvents, and various corrosive materials, as well as paints, asbestos, and communications equipment batteries. These wastes were generated by processes which included vehicle maintenance, aircraft maintenance, facility maintenance and rehabilitation, painting operations, degreasing, cleaning operations, soil excavation, grounds maintenance, and photo processing. The MCBCP will be closing this unit and has revised their Closure Plan, which was approved in 1985, to update the information and activities to be conducted during the closure.

The Revised Closure Plan (RCP) presents a work plan for implementing the closure activities at the HWSF, with updated references and statements relevant to DTSC and USEPA guidance documents. The narrative of the RCP has been updated to evaluate the current conditions at the facility. The Sampling and Analysis Plan contained within the RCP has been revised to become consistent with the EPA document entitled Guidance for Preparing Standard Operating Procedures. In summary:

- 129 additional soil samples will be taken below the “impervious liners” that were applied to bunker floors in the early 1990’s to identify any releases that may have taken place prior to the liners installation. Continuous core samples will be collected and logged.
- A soil gas investigation will occur. 126 additional soil gas samples will be taken. A Quality Assurance Project Plan (QAPP) has been added to the RCP. This QAPP has been written to reflect the current and appropriate test methods in EPA publication SW-846, titled “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Update III.”
- The RCP has been updated to incorporate the installation of groundwater monitoring wells if the closure verification sampling indicates a release. The RCP has been updated to indicate a closure date and current contact person. The RCP has updated maps to reflect current conditions. The RCP has been updated to reflect the current hazardous waste inventory and the Contaminants of Potential Concern.
- The RCP has been updated to state that samples will be analyzed for PCBs, SVOCs, TPH-G, TPH-D, VOCs, and Title 22 metals.
- The RCP has been updated to list the current waste disposal facilities that will be used during closure.

- The RCP has been updated to include a round of characterization sampling prior to any excavation that may be required. The RCP has been updated to indicate the amount of waste and contaminated (357 yd<sup>3</sup>) generated during closure and to indicate the amount of wastewater (24,795 gallons) that will be generated during closure.
- The RCP has been updated to state intended closure standards and to include a proper closure certification statement as provided in California Code of Regulations, title 22, Section 66270.11, if a cleanup of contamination is required. Cleanup of contamination will be required if sample results taken at the 24 Area HWSF are above method reporting limits as stated in the Sampling and Analysis Plan, or if sample results are above background levels. If existing and relevant background soil data does not exist, background soil samples will be collected from an area within or near the 24 Area HWSF that has lithography similar to that of the site and appears relatively undisturbed. Additionally, the locations chosen for collecting background soil samples will be at an elevation higher than the general elevation of the 24 Area HWSF to preclude the possibility that any potential releases may have impacted soil “downstream” from the storage area. Three background samples will be collected from these designated areas and in locations that possess similar lithology and geological appearance and composition.
- Additional activities to be conducted include decontamination, soil sampling and excavation and removal of any contaminated soil, soil boring, soil gas monitoring, and groundwater monitoring. The Closure Plan has also been modified to include a Sampling and Analysis Plan (SAP), a Task Health and Safety Plan (THSP), and a Waste Management Plan (WMP). The Closure Plan has been modified to provide a comprehensive strategy for achieving Clean Closure.

If after analysis, bunker floors are found to be contaminated, the soil, asphalt, and concrete generated by during facility decontamination will be segregated by matrix and each unique location to facilitate subsequent disposal. These materials will be analyzed and characterized to determine disposal requirements. No more than a maximum of approximately 357 cubic yards of asphalt and/or concrete and soil would be removed during the closure. If additional soil removal is necessary to achieve closure, or significant groundwater contamination is found, a revised closure plan will be submitted for DTSC approval and a new environmental analysis will be conducted under the California Environmental Quality Act.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Marine Corp Base Camp Pendleton

Exemption Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]  
 Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]  
 Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]  
 Categorical Exemption: [State type and section number] Title 14, Cal. code regs., Sec 15301  
 Statutory Exemptions: [State code section number]  
 General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: With Certainty, No Possibility Of A Significant Environmental Effect.

Reasons Why Project is Exempt:

1. The Closure Plan was previously approved by the Department in 1985. However, the plan needed to be revised because it is more than 20 years old and it is now required to address in detail the activities already approved. The activities to be performed include decontamination, soil sampling and excavation and removal of any contaminated soil, soil boring, soil gas monitoring, and groundwater monitoring, if necessary. No more than 357 yd<sup>3</sup> of waste and contaminated soil will be generated during closure and no more than 24,795 gallons of wastewater will be generated during closure.

2. Waste generated during the decontamination of the facility will be managed, sampled, analyzed, characterized, stored, and disposed of appropriately. Hazardous waste will be taken to an authorized off-site facility. Hazardous wastes will not remain on-site for greater than 60 days.
3. Wastewater generated from cleanup activities will be collected and temporarily stored in U.S. Department of Transportation-approved drums. The storage system will include a secondary containment capable of containing spilled liquid wastes of 110 percent of container volumes. Wastewater will be profiled, manifested, and transported to an off-site facility permitted to handle hazardous waste.
4. No person will be allowed on the site during site operations without first being given a site hazard briefing and authorization.
5. No air permits from the air quality management district will be required.
6. The storage facility is fenced, gated, posted, patrolled, and within the interior of the MCBCP which further restricts access.

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Project Manager Name	Project Manager Title	Phone #
Original Signed By		6/21/07
Branch Chief Signature		Date
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