



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

111 JACKSON STREET, ROOM 6040

OA ID 94607

June 11, 1986

File No. 2199.9080A (GRF)

Mr. Alex Dong
Western Division
Naval Facilities Engineering Command
P. O. Box 727
San Bruno, CA 94066

Attention: Ms. Louise Lew

Dear Mr. Dong:

Subject: Alameda NAS (West Beach) Landfill

We have reviewed your March 28, and April 25, 1986 letters describing the problems you have encountered, affecting the timely completion of the site closure. I understand that the Navy would now like to utilize the landfill for the placement and dewatering of dredge spoils at the site for use as cover material. This activity would require an amendment to your waste discharge requirements.

Our main concerns with your dredge spoils proposal are ponding water from the dredge spoils which may affect a leachate build-up in the landfill, and the additional load on the landfill which may decrease the stability of the sea wall. The Board's consideration of your proposal would be based upon your submittal of a satisfactory report which addresses the following:

1. Demonstrate that the stability of the rock sea wall will not be affected by the additional load from the dredge spoils dewatering ponds;
2. The design of the proposed dewatering ponds will prevent pond water infiltration into the landfill, and the pond overflow will meet effluent limits at all times. The following should be included with this report:
 - a. The sample locations of the source material being used in liner construction and methods used to select, collect, and prepare samples;
 - b. The permeability of the liner;
 - c. Methods used to test moisture content, density and permeability;
 - d. The moisture/density/permeability test data supporting a recommended compaction criteria;

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- e. Methods used to determine that overflow from dredge spoils will comply with effluent limits on Settleable Matter of 1.0 ml/l-hr, maximum, and pH of 6.5 minimum and 8.5 maximum levels that staff will propose in the amended waste discharge requirements;
3. The quality control of the pond construction shall be under the direct supervision of a registered civil engineer or certified engineering geologist to assure that construction of the ponds will meet applicable requirements and the proposed design specifications. The report should include information on the proposed control plan procedures implemented such as:
 - a. Proposed location and number of samples;
 - b. Proposed test methods to be used to determine permeability. Include both laboratory and field correlative tests.
 4. Demonstrate that the proposed dredge spoils material is suitable for impermeable cover as determined by:
 - a. Physical analysis of a representative number of samples of material showing permeability (relative to water) of 1×10^{-6} cm/sec or less;
 - b. Chemical analysis of the dredged sediment for oil and grease, heavy metals, total identifiable hydrocarbons, PCB's;
 5. A proposal for a leachate monitoring and removal system during the dredge spoil drying operation.

If your submittal addresses the concerns described in this letter and is received by no later than July 30, 1986, then I believe it would be feasible to schedule the revised waste discharge requirements for Board consideration in October 1986. Enclosed is a Report of Waste Discharge Application form for this revision which should be submitted to this office together with your technical report and your filing fee check (see enclosed schedule) made payable to the State Water Resources Control Board. You may not begin disposal of any dredge spoils without submitting a complete Report of Waste Discharge and allowing the Board adequate time to consider your request.

The Wahler Associates March 27, 1986 letter regarding the slurry wall, did not enclose Plates C-1, 3, and 7. Please send us copies of these plates.

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It appears the Navy has made site modifications which were not a part of the approved closure plan. Such action is a violation of your waste discharge requirements. You are hereby requested to not begin any site modifications which were not described in the approved closure plan until you request that the Regional Board modify your closure plan and you receive such approvals.

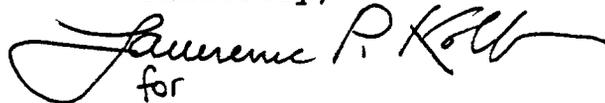
Your request for revision of the closure plan should be submitted to this office by October 1, 1986 to include the following:

1. A complete description including plans, drawings, and specifications of all interim and final grading, drainage, and erosion control;
2. A documentation of financial assurance that funds for closure are available;
3. Your proposal for placement of cover over the waste located along the wetland/landfill interface.

During our meeting with you on June 2, 1986, it came to our attention that the Navy has constructed an above-ground perimeter dike, and that the purpose of this dike was to prepare the site in anticipation of our approval for its use as a dredge spoils operation pond. This action is not in conformance with the adopted waste discharge requirements for the site since it allows ponding of rainfall. This situation should be corrected prior to the start of this year's wet weather. Therefore, you are requested to submit within 30 days from the date of this letter, a proposal and time schedule to bring the site back into compliance with requirements by no later than October 1, 1986. Any pond dikes needed this year as part of the dredge spoils project should be clearly identified and do not have to be discussed in this submittal.

If you have any questions regarding this letter, please call Gloria Fulton of our staff at (415) 464-0903.

Sincerely,



for
HAROLD J. SINGER
Industrial Division Chief

Enc.

cc: DOHS
Alameda County Environmental Health
Solid Waste Management Division