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Ser 1142/Alameda/NAS
27 AUG 1985

California Regional Water Quality Control Board
San Francisco Bay Region
1111 Jackson Street, Room 6040
Oakland, CA 94607

Attention: Gloria Fulton

Your order number 83-55 of 21 September 1985 specified closure requirements for the Navy's proposed closure of the Alameda Naval Air Station Solid Waste Disposal Site and established a schedule of compliance. In our June 5, 1985 letter to you, we informed you that we expected the one foot of cover to be completed by 30 September 1985. Recent developments regarding a possible wetlands in our borrow area preclude the movement of additional clay cover material from this area to the landfill at this time. It now appears that the additional cover material will need to be imported delaying the placement of cover. In addition, protected bird species were found at the site. Construction work in the adjacent landfill cannot commence until the majority of the birds have fledged and have left the site. We anticipate that work can commence in mid-September. Cover completion is therefore dependent upon the availability of imported fill material as well as the birds leaving the site. Barring any unforeseen problems, we expect that the cover can be completed by October 31, 1985.

Because of the potential wetlands in the borrow area adjacent to the landfill, we realize that our monitoring program to determine the effectiveness of our interim closure measures will need to address possible impacts to the wetlands. We will continue to discuss with Ms. Gloria Fulton of your staff your concerns regarding impacts to the potential wetlands and to San Francisco Bay.

We are currently in the process of getting an official determination on whether the borrow area is or is not a wetlands. If it is determined that the area is a wetlands, we will close the landfill site to comply with the legal requirements for wetlands protection. If the borrow area is not a wetlands, we will proceed with closure as originally planned.

The Alameda Naval Air Station is currently being investigated under our Navy Assessment and Control of Installation Pollutants (NACIP) Program. The NACIP Program is designed to identify contamination of Navy lands resulting from past operations and to institute corrective measures, as needed. Specifically, the NACIP Program consists of three distinct phases:

Initial Assessment. Performing record searches and personnel interviews to collect and evaluate all evidence supporting the existence of a contamination problem at an installation.

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Confirmation. Performance of on-site investigations, including physical and analytical monitoring, to confirm or refute the existence of contamination reported during the Initial Assessment phase. If contamination is present, the study will quantify the extent of the problem, and if necessary, recommend corrective measures.

Remedial Measures. Installation of needed remedial measures to control and mitigate contamination.

We have completed the initial assessment phase of the NACIP Program and are now in the confirmation phase. We are currently in the process of advertising for engineering services for completion of the confirmation phase. In this phase, we will perform further physical and analytical monitoring at several sites of concern, including the landfill, to determine whether there is a problem with contamination. If a problem exists, the study will quantify the extent of the contamination and recommend corrective measures as necessary. We still maintain that the landfill site is a Class II disposal site, but if our investigation finds this not to be the case, we will close the site accordingly.

Questions regarding this matter may be directed to Louise T. Lew at (415) 877-7497.

ALEX E. DONG
HEAD, WEST CENTRAL ENVIRONMENTAL SECTION

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NAS Alameda

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