



DEPARTMENT OF THE NAVY  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132-5190

N00236.000350  
ALAMEDA POINT  
SSIC NO. 5090.3

5090  
Ser 06CA.GC/0183  
February 26, 2002

Ms. Marcia Liao  
Project Manager  
State of California Environmental Protection Agency  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710

Dear Ms. Liao:

Subj: IDENTIFICATION OF STATE "APPLICABLE" OR "RELEVANT AND APPROPRIATE"  
REQUIREMENTS (ARARS) FOR REMOVAL ACTION AT ALAMEDA POINT,  
ALAMEDA, CALIFORNIA

Pursuant to previous discussions and to accomplish the goals of Alameda Point, Installation Restoration (IR) program, we are hereby requesting that the Department of Toxic Substances Control (DTSC) identify potential State chemical-specific, action specific, and location specific ARARs for the lead based paint in soil cleanup of Parcels 79, 98, 105, 106, and 107. Information on these parcels can be found in the draft final *Sampling and Analysis Report, Characterization of Lead Contaminated Soil From Water Tanks, and Antenna Towers*, of November 30, 2001 and the draft *Water Tower and Antenna Sites Lead Removal Action, Engineering Evaluation and Cost Analysis*, of December 21, 2001.

In addition, the Department of the Navy (DON) is requesting that the State of California identify any other criteria, advisories, guidance, and proposed standards that the State requests be considered (TBCs) for the above identified sites. Please coordinate responses from all California state agencies.

Timely identification of potential State ARARs is required under Section 121(d)(2)(A) of CERCLA and under the National Contingency Plan (NCP), 40 CFR 300.400(g) and 300.515(d) & (h). Experience to date around the country has shown that a failure to identify ARARs with sufficient precision, early in the process, can cause severe disruptions in timely implementation of remedial action. To ensure timely and complete ARARs identification, please include the following information:

1. A specific citation to the statutory or regulatory provision(s) for the potential State ARAR and the date of enactment or promulgation.
2. A brief description of why the potential STATE ARAR is applicable or relevant and appropriate to the particular IR Site.
3. A description of how the potential State ARAR would apply to potential remedial action, including: specific numeric discharge, effluent, or emission limitations; hazardous substance/constituent action or cleanup levels; etc., if the State intends to take the position that the potential State ARAR includes such limitations, levels, etc.

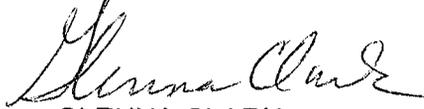
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4. If the State believes its proposed ARAR is more stringent than the corresponding Federal ARAR, please provide the rationale and technical justification for this position.

5. If the State determines that there is not enough information to fully respond to our request, please identify any additional information that would be required to support identification of State ARARs and their application.

Consistent with 40 CFR 300.515(h)(2), we are requesting that you send a response via first class mail addressed to me and postmarked within 30 calendar days of receipt of this request. If you have any technical questions concerning this request, please call me at (619) 532-0951. For any legal questions, please call Mr. Armando Alvarez, Environmental Counsel at (619) 532-0992.

Sincerely,



GLENN CLARK  
Remedial Project Manager