



# Department of Toxic Substances Control



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December 9, 2002

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Department of The Navy  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

## COMMENTS ON THE DRAFT TECHNICAL MEMORANDUM – EVALUATION OF ISSUES RELATED TO RCRA FACILITY PERMIT, FORMER ALAMEDA NAVAL AIR STATION, ALAMEDA, CALIFORNIA, EPA# CA2 170 023 236

Dear Mr. Ocampo:

The Department of Toxic Substances Control (DTSC) appreciates your effort in preparing the Draft Technical Memorandum – Evaluation of Issues Related to RCRA Facility Permit dated October 8, 2002 (the Document). The Document provides a summary of permitting and closure status of various hazardous waste management units, solid waste management units (SWMUs), Areas of Concern (AOC), and generation accumulation points (GAPs).

The DTSC's Standardized Permits and Corrective Action (SPCA) Branch has the primary responsibility of regulating the hazardous waste management units, solid waste management units, and Areas of Concern. Therefore, the SPCA Branch has focused its review effort on these areas and has the comments described in the Enclosure.

You requested that the SPCA Branch coordinate all agencies comments. We have contacted Ms. Judy Huang of the Regional Water Quality Control Board. Ms. Huang indicated that her office will not comment on the Document at this time. The DTSC's Office of Military Facility will forward its comments to you in a separate letter.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

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If you have any questions, please call me at (510) 540-3975.

Sincerely,



Wei-Wei Chui  
Section Chief  
Standardized Permits and Corrective Action Branch

Enclosure

cc (with Enclosure):

Ms. Judy Huang  
Associate Engineering Geologist  
Regional Water Quality Control Board  
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## Enclosure

### 1. Interim Status

The authorization granted under Part A is referred to as an "Interim Status Document (ISD)". A hazardous waste management unit granted under an ISD is referred to as an "ISD unit". We suggest the revised Document use the terms "ISD, ISD unit", instead of "Part A Permit, Part A Permitted Unit".

### 2. Section 2.2.1 "RCRA Permit"

The Document states that there were a total of 15 ISD units (Executive Summary Page 1). Based on the Table 2-2 "RCRA Part A Permitted Units", the following units were identified:

- (1) Area 37 - Underground Storage Tanks
- (2) Annex Area 37
- (3) Southeast Corner of Building 5
- (4) Bilge Oily Water Treatment System - BOWTS
- (5) Industrial Wastewater Treatment Plant (IWTP) 360
- (6) IWTP 410
- (7) TP - 01 (silver recovery)
- (8) TP - 02 (silver recovery)
- (9) TP - 03 (silver recovery)
- (10) TP - 04 (silver recovery)
- (11) TP - 05 (silver recovery)
- (12) TP - 06 (drum rinsing)
- (13) TP - 07 (drum rinsing)
- (14) TP - 08 (drum rinsing)
- (15) TP - 09 (pH adjustment)

Section 2.2.1 "RCRA Permit" needs to explain that BOWTS and TPs 01 - 09 were converted to Tiered Permits Units and to provide the dates of conversion or TP Application. According to Table 2 -2, the dates of the conversion, or the TP Application for TPs 1 - 9 were August 8, 1994, and BOWTS March 2, 1995.

### 3. Section 2.2.3. "RCRA Facility Investigation"

The Document stated "The BCT agreed that the RFI would be conducted through the coordination of existing environmental program, namely the CERCLA Program, UST Corrective Action Program and the EBS." The Document further states "... sampling activities during Phase 2 of the EBS ...are considered the functional equivalent of the RFI."

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In order to be considered functional equivalent to an RFI, the Navy is advised to review its hazardous waste facility permit, Sections V. H through V.J which have detail description on how to conduct an RFI. The Navy shall ensure that all RFI activities or equivalent activities are being met.

#### 4. Section 3.2 Industrial Wastewater Treatment Plants (IWTPs)

DTSC considers the IWTP 360, a permitted unit, not closed yet. The SPCA Branch on November 19, 2002, forwarded to the Navy a copy of the DTSC Geological Service Unit memorandum in which the reasons why the unit is not closed were included. The Navy shall complete the RCRA closure and potential post-closure activities for this unit.

#### 5. Section 3.4 Tiered Permitted (TP) Status

The TP units were converted from previous ISD units. The closure of such units may be still subject to ISD closure requirements. The SPCA Branch is awaiting a legal interpretation from the DTSC's Office of Legal Counsel, and will advise the Navy as soon an answer is received.

#### 6. Section 4.0 Evaluation of the Nonpermitted AOC, GAPs and SWMUs

The solid waste management unit (SWMU) is defined in the Title 22, California Code of Regulations, section 66260.10 as "[A]ny unit at a hazardous waste facility from which hazardous constituents might migrate, irrespective of whether the units were intended for the management of wastes, including but not limited to: containers, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators and underground injection".

Please revise the definition of SWMUs in Section 4.0.

#### 7. Section 4.1 Evaluation Methodology

It is unclear the significance of distinguishing GAPs within or outside a CERCLA site. Any GAP that has had hazardous constituents released is subject to corrective action.

#### 8. Section 4.2 Regulatory Framework for Points of Generation

The statement "[T]hese regulations outline operation procedures, establish criteria for the conditionally exempt status and direct closure activities" is unclear. AOC's and SWMU's closure and subsequent remediation are subject to corrective action requirements, including but not limited to RFI, corrective measure study, remedy selection, etc.

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9. Section 4.3 Closure and Cleanup Procedures

The Document reads that AOC, GAP or SWMUs closure were completed and received DTSC's NFA closure concurrence. The Document referred to the SSPTS 1999 Report. Based on DTSC's November 4, 1999 letter issued by the Office of Military Facilities, DTSC did not approve all the NFA recommendations. Please clarify.

10. Section 4.4 Physical Inspection

It is unclear about the statement "All obvious hazardous waste had been removed..." Please clarify.

11. Section 5 Oil-Water Separator (OWS); and Section 6 Washdown Areas (WD)

If there have been hazardous constituents released from these units or areas, these areas are considered Solid Waste Management Units based on the abovementioned definition.

12. Section 5.3 Physical Inspection

Please indicate how many Oil Water Separators (OWSs) were associated with the storm system. Section 5.3 states that there were 50 OWSs investigated for the Document, however, the status of only four OWSs is presented. Please describe the status of the remaining OWSs.

13. Table 2-2

IWTP 360 – Please update the entry in the "Status of Facility" column to reflect that DTSC responded to the Navy's August 1, 2002 letter

IWTP 410 - Please delete the reference to the Building 24 from the "Supporting Documentation"

14. Table 2-3

IWTP 24 – It is unclear about the entry of ERRG's report dated March 1999, referred in the "Supporting Documentation" column.