

**MEETING MINUTES
FOR
RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) TEAM
DISCUSSION AND SITE VISIT
ALAMEDA POINT
Alameda, California
January 30, 2003**

Attendees:

Engineering Field Division Southwest (EFDSW)	Andrew Dick Lou Ocampo Sue Neishi Doug DeLong
Department of Toxic Substances Control (DTSC)	Wei Wei Chui Mohinder Sandhu
Tetra Tech EM Inc. (TtEMI)	Beth Kelly

Introduction:

Lou Ocampo, Navy Remedial Project Manager (RPM), welcomed all the attendees and asked for a quick introduction by everyone. He explained that the purpose of the meeting was to discuss the issues associated with the RCRA permit and remaining permitted units and to give Mohinder Sandhu an opportunity to visit the RCRA sites that had not yet achieved closure. Mr. Sandhu explained that he was developing a workshop for DTSC staff that would provide guidance on RCRA integration with the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) program, and other RCRA issues that are common to many of the Navy bases. Mr. Ocampo handed out a map of the RCRA units and a two-page synopsis of the RCRA permit, titled "Update on RCRA Facility Permit EPA ID CA 2170023236 Alameda Point, Alameda, California." This synopsis from the RCRA technical memorandum included: discussion of the background of the RCRA permit; descriptions and closure or no further action status for the Part A remaining permitted units and the Part B remaining permitted units; and the status and recommendations for nonpermitted units, oil water separators, and washdown areas. Mr. Ocampo explained that after the discussion of the RCRA permit issues, the attendees would visit the East Housing area, Area 37, Industrial Wastewater Treatment Plants (IWTP) 360, 25, and 32.

Discussion Topics:

RCRA permit

Mr. Sandhu explained that the Navy does not need to renew the permit (permit expires in July 2003). He explained that the permit covers not only the permitted units but also all Solid Waste Management Units (SWMU) and that the facility owner (Navy) is responsible for RCRA corrective action for the entire property under their ownership. He also stated that the Navy needs to finish all corrective actions and close the permit before it can transfer the property, otherwise the transferee will inherit the permit and necessary corrective actions. Post-closure plans and post-

closure permits are separate from the RCRA permit, would be unit specific, and required for each remaining permitted unit that has not achieved clean closure.

Mr. Sandhu explained that the Navy's permit modification would consist of a request to terminate RCRA corrective action and would carve out of the permit those parcels that have no corrective actions and keep the parcels with corrective actions. A map is needed for the modification. This request would include the updated closure history and description for those former permitted units and SWMUs to be removed.

Post-closure permits

Mr. Sandhu explained that post-closure permits were necessary for permitted or interim status units that could not obtain clean closure. Releases from regulated units require post closure permits. However, clean closure or closure by removal can be based on health-based risk for the reuse scenario, such as residential or industrial reuse. Post closure permits are for maintenance activities such as monitoring, or there should be institutional controls. If there is no need to monitor, such as if the risk is less than 1×10^{-6} , or there are institutional controls, then a post closure permit would not be necessary. The post closure permit would remain with the landowner until the corrective action is complete. There is an application fee and annual fee for these post closure permits.

Navy Letters on RCRA Permit

Mr. Sandhu stated that DTSC has responded to the Navy letter signed by Walter Sandza. DTSC will be responding soon on the letter at Fleet and Industrial Supply Center Oakland, Alameda Facility Alameda Annex, signed by Mike McClelland.

Area 37

Andrew Dick explained that at Area 37, there were underground storage tanks (UST) that held petroleum products and petroleum waste. There were seven USTs in that area that had been designated RCRA waste. All USTs have been removed and remediation was underway based on the Navy's total petroleum hydrocarbon (TPH) strategy and Regional Water Quality Control Board (RWQCB) oversight. Mr. Dick explained that the TPH strategy had been developed with U.S. Environmental Protection Agency (EPA), RWQCB, and DTSC staff; however, the DTSC permit branch staff had not concurred with the TPH strategy for cleanup goals. Beth Kelly explained the TPH strategy, which includes preliminary remediation criteria (PRC), and a risk based cleanup criteria for TPH, benzene, toluene, ethylbenzene, xylenes (BTEX), methyl tertiary butyl ether (MTBE), and lead for soil and groundwater, which are protective of human health and aquatic receptors.

IWTPs 25 and 32

Mr. Sandhu explained that all pipes and tanks associated with a unit, regardless of whether they were specifically named in the permit, would be considered part of the unit. This is based on those items being used in a manner that involves hazardous waste.

Regarding the issue of leaving tanks in place and decontaminating them, Mr. Sandhu explained that there is a higher standard than the standard for scrap metal. For scrap metal, the owners only have to decontaminate and remove to a visual lack of debris standard. In order to leave tanks in place, there needs to be a practical solution to meet the regulatory requirements, so that in the future another landowner would not remove the tanks and lose track of their use, which might be a health risk to someone.

RCRA units within CERCLA sites

Mr. Sandhu explained that when a RCRA SWMU is located within a CERCLA site, the CERCLA process would be required to include RCRA applicable relevant appropriate requirements (ARAR) in the cleanup. Once the CERCLA process is complete and the ARARs are met, then the RCRA corrective action would be complete.

Site Tour:

The attendees visited the East Housing Area, Area 37, IWTP 360, IWTP 25, and IWTP 32. The East Housing Area consists of vacant and graded land. After observing this area, Mr. Sandhu explained that this area could be excluded from the Navy's facility corrective action responsibility. Lou Ocampo stated that the Navy has been discussing this issue with the City of Alameda.

During the visit to IWTP 360, the attendees discussed the potential soil and groundwater contamination within the location of the former drain lines coming from Building 360 to the IWTP, under the concrete. Ms. Kelly explained that the Navy had collected additional soil and groundwater data along the drain lines, and that this data had been presented to DTSC at a previous meeting. She explained that the Navy has been regularly monitoring the groundwater in this area under the basewide groundwater monitoring program for this CERCLA site (Site 4). Wei Wei Chui mentioned that DTSC sent out the responses to Navy on November 19, 2002, and DTSC does not consider the unit is closed.

At Area 37, the attendees observed the location of the former USTs, now vacant land.

At IWTP 25, the attendees walked inside the fenced area and looked at the condition of the pipes and tanks. Rainwater had accumulated inside some of the tanks.

At IWTP 32, the attendees looked at the tanks, piping, and condition of the concrete, and at the tanks and sumps in the basement area. Mr. Sandhu agreed that it made sense to propose in a closure plan that the sumps and tanks in the basement would remain in place but rendered unusable, because they were imbedded so deeply into the ground beneath the building and due to their construction material.



TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N68711-00-D-0005

Document Control No. TC.A033.10064

TO: Mr. Ron Fuller, Code 02R1.RF
Contracting Officer
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Southwest Division
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8517

DATE: 02/27/03
DO: 033
LOCATION: Alameda Point, Alameda, California

FROM: Michael Wanta, Contract Manager

DOCUMENT TITLE AND DATE:

Meeting Minutes for Resource Conservation and Recovery Act Team
Discussion and Site Visit, January 30, 2003

TYPE: Contractual Deliverable (checkbox), Technical Deliverable (checkbox), Other (TC) (checked)

VERSION: NA (e.g., Draft, Draft Final, Final) REVISION #: NA

ADMIN RECORD: Yes (checked), No (checkbox) CATEGORY: Confidential (checkbox)

SCHEDULED DELIVERY DATE: NA ACTUAL DELIVERY DATE: 02/27/03

NUMBER OF COPIES SUBMITTED TO NAVY: 0/6C/7E
Legend: O = original transmittal form, C = copy of transmittal form, E = enclosure

COPIES TO: (Include Name, Navy Mail Code, and Number of Copies)

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