STATE OF CALIFORNIA
PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
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OAKLAND, CA 94612
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Gary Munekawa
Code 1811
Naval Facilities Engineering Command
Western Division
900 Commodore Drive
San Bruno, CA 94066-2402

August 12, 1993
File No. 2199.9285 (JBN)

Dear Mr. Munekawa,

REGIONAL WATER QUALITY CONTROL BOARD COMMENTS TO DRAFT FIELD SAMPLING PLAN FOR FOLLOW-ON WORK REMEDIAL INVESTIGATION/FEASIBILITY STUDY PHASES 5 AND 6 - LANDFILL INVESTIGATIONS, NAVAL AIR STATION ALAMEDA

Installation of soil borings and monitoring wells in the interior of the Site 1 Disposal Area and the West Beach Landfill (Site 2) during the follow-on work for the Remedial Investigation/Feasibility Study Phases 5 and 6 will not be required. Concerns have been expressed that unexploded ordinances may be encountered during drilling at Sites 1 and 2. However, landfill sampling during Phases 5 and 6 at Sites 1 and 2 shall follow these specific guidelines.

1. The Navy needs to determine the potential for vertical migration of contaminants within the two landfills. This will require peripheral subsurface soil sampling on all sides of the two landfills to confirm the consistency, permeability, and thickness of the Holocene Bay Mud Unit as well as the Late Pleistocene Estuarine Deposits (San Antonio Formation). In the absence of sampling these two layers in the interior of the landfills, the Regional Board needs to see peripheral geologic cross sections on all sides which show a continuous aquitard in order to feel comfortable that this aquitard does indeed exist throughout the landfills.

2. The Navy also needs to define the vertical extent of groundwater contamination for both landfills. This shall be done by first sampling the groundwater in the second water bearing zone in the first aquifer (the Late Pleistocene/Holocene Alluvial and Eolian Deposits) on all sides of the landfills. This will determine whether the second water bearing zone of the first aquifer is impacted and if the contaminants have the potential to migrate to the second aquifer, the Undivided Pliocene/Pleistocene Terrestrial and Estuarine Deposits.

3. The Navy shall define the lateral extent of the groundwater contamination of the aquifers that underlie the two disposal areas. This shall be done by making sure that there is sufficient groundwater monitoring in both water bearing zones of the first aquifer on all sides of the landfills. Groundwater

monitoring may need to extend beyond the landfill boundaries until the extent is defined.

4. The Navy needs to examine the claim that there have been deposits of radiologic materials within West Beach Landfill in the past. The Navy should do some surface analysis within the landfill to attempt to see if any radioactivity is being emitted. The Navy needs to look at how a cap might be designed to effectively contain such emission with the future implications of landfill closure and reuse.

As agreed to in both the July 28 and August 6 meetings the Navy needs to prepare a proposal, implementing the four conditions listed above. The proposal shall include details of the peripheral soil boring, monitoring well, CPT, and hydropunch monitoring proposed at both Sites 1 and 2. The Navy shall submit this proposal by August 31, 1993 for review and approval by the Regional Board and the Department of Toxic Substances Control.

If you have any questions on the above letter, please contact me at (510) 286-0301.

Sincerely,

James Nusrala
Remedial Project Manager

cc:
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