

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

70 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737
(510) 540-2122

April 17, 1995

Commander
Western Division
Naval Facilities Engineering Command
Attn: Mr. Gary Munekawa, Engineer in Charge
Code 09ER3GM
900 Commodore Drive
San Bruno, California 94066-2402

Dear Mr. Munekawa:

**REQUEST FOR REMOVAL ACTION WORKPLANS FOR FUTURE REMOVAL ACTIONS
AT NAVAL AIR STATION, ALAMEDA**

The California Environmental Protection Agency, Department of Toxic Substances Control requests that the Navy prepare documentation equivalent to Removal Action Workplans (RAW) for removal actions at Naval Air Station, Alameda. This request remains in effect until a Federal Facilities Site Remediation Agreement is executed that addresses removal actions. This request is made so that future removal actions are consistent with recent amendments to the California Health and Safety Code (H&SC). Senate Bill 1706 amended H&SC Sections 25356.1 and 25358.9, and added Section 25323.1 to the H&SC. These amendments went into effect January 1, 1995. This request made in accordance with Sections 114(a) and 120(a)(4) of the Comprehensive Environmental Response Liability Act as amended by Superfund Amendments and Reauthorization Act.

Whether a RAW or an Engineering Evaluation/Cost Assessment (EE/CA) is used, the documentation in support of a removal action must meet the substantive and procedural aspects of both an EE/CA as defined in Section 300.415 of the National Contingency Plan and a RAW as defined in H&SC, Section 25323.1. The RAW must include a detailed engineering plan for conducting the removal action, a description of the onsite contamination, the goals to be achieved by the removal action, and any alternative removal options that were considered and rejected and the basis for that rejection. The NCP states that "the EE/CA is an analysis of the removal alternatives for a site." U.S. EPA guidance on "Conducting Non-Time-Critical Removal Actions Under CERCLA" identifies the analysis of removal action alternatives to include effectiveness, implementability, and cost.

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Procedurally, in order to meet the public involvement requirements of the EE/CA, the draft RAW must be circulated for at least 30 days for public comment. After the comment period has closed, and all comments have been addressed, the RAW may be approved by the Department and become final. If an Action Memorandum is generated in place of a final RAW, the Action Memorandum must meet the substantive requirements of RAW.

If you have any questions regarding this letter, please call me at (510) 540-3809.

Sincerely,



Thomas P. Lanphar
Project Manager
Base Closure Branch

cc: Mr. James Nusrala
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Lt. Mike Petouhoff
Base Environmental Coordinator
Alameda Naval Air Station
Building 1, Code 52
Alameda, California 94501

Mr. James Ricks
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105