

DEPARTMENT OF TOXIC SUBSTANCES CONTROLREGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737
(510) 540-3724

October 23, 1995

Commander
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Camille Garibaldi
900 Commodore Drive
San Bruno, California 94066-2402

Dear Ms. Garibaldi:

**DRAFT WORKPLAN FOR TEMPORARY STORAGE AND TREATMENT AREA FOR SITE
15 SOIL, NAVAL AIR STATION, ALAMEDA**

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) and San Francisco Regional Water Quality Control Board (RWQCB) have reviewed the above mentioned document. The RWQCBs comments are enclosed.

The Temporary Treatment and Storage Area is being constructed to contain soil from Site 15 only. This action is a modification of the Action Memorandum and Removal Action Workplan for the Site 15 Removal Action. An Administrative Memorandum will be included in the Administrative Record identifying the changes in the Site 15 Removal Action.

The DTSC and RWQCB share concerns about the collection of rain water within the soil containment area. The workplan should address this issue and explain how rainwater will be kept out of the containment area and leachate collection system.

The storage area is identified as a Class II Soil Storage Area. Please clarify this classification. Our understanding is that the storage area is for Class I and Class II soil from Site 15.

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

Sincerely,

A handwritten signature in cursive script that reads "Thomas P. Lanphar".

Thomas P. Lanphar
Project Manager
Base Closure Branch

RECEIVED

Enclosure
cc: See next page

1241



Ms. Garibaldi
October 23, 1995
Page Two

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

Kent M. Rosenblum
Early Action Focus Group Chair
2900 Main St.
Alameda, California 94501

MEMORANDUM**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

2101 Webster Street, Suite 500
Oakland, CA 94612

Phone: (510) 286-1255
Fax: (510) 286-1380

Prepared By: Vincent Christian

Phone No.: (510) 286-4222

9285 (vc)

Date: October 18, 1995

File No.: 2199.9980A

Subject: Draft Work Plan Temporary Storage and Treatment Area, Naval Air Station
Alameda, California, Revision C, October 1995

The subject document has been reviewed by Regional Board staff. The design of the Temporary Storage and Treatment Area (TSTA) is sufficient to prevent contaminants in the soils stored in the TSTA area from migrating. However, the plan does not address the problem of excluding rainwater from the leachate collection system. It is unlikely that very much leachate will be generated because the soils transferred to the TSTA will be dried and then covered with plastic. However, storm water falling on the bermed class II soil storage area has no way of leaving the area except through the leachate collection system. A one inch storm in this area will generate approximately 10,970 gallons of water. Once the storm water reaches the collection system, it can not be differentiated from leachate, although it would be very inappropriate to treat it as if it were leachate. In order to resolve this problem, measures should be taken exclude storm water from this area.

While it is not the intention of Regional Board staff to delay construction of this project, it is very important that this problem be addressed as soon as possible to assure that the TSTA can be operated in an efficient and effective manner. The Navy should provide a response to this concern describing the measures that will be taken to exclude storm water from the TSTA. Regional Board approval of this project will be withheld until this information is provided.

Concurred by:



Ron Gervason, Section Leader