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Ser 18312GK/L6234
29 May 1996

Mr. Tom Lanphar
California Environmental Protection Agency
Department of Toxic Substances Control
Region 2
700 Heinz Avenue, Suite 200
Berkeley, CA 94710 - 2737

Subj: RESPONSE TO COMMENTS FROM THE DEPARTMENT OF TOXIC
SUBSTANCES CONTROL (DTSC) ON THE PRELIMINARY DRAFT
ENGINEERING EVALUATION / COST ANALYSIS (RAW) FOR SITE 16,
NAVAL AIR STATION, ALAMEDA

Dear Mr. Lanphar,

Enclosed is the Navy's response to the DTSC's comments on the Preliminary Draft Engineering Evaluation/Cost Analysis (RAW) for Site 16. The Navy does not consider Senate Bill 1706 to be an ARAR, however, all procedures for implementing a Remedial Action Plan (RAP) will be followed. A RAP will be required instead of a RAW based on the cost to implement the removal action.

If you have any questions regarding this matter, please feel free to contact Mr. George Kikugawa at (415) 244-2549, Fax (415) 244-2654.

Sincerely,

Original signed by:

GEORGE KIKUGAWA
RPM NAS Alameda
By direction of
the Commanding Officer

Copies to:
U.S. Environmental Protection Agency (Attn: James Ricks)
NAS Alameda (Attn: Steve Edde)
NAS Alameda (Attn: Hans Peterson)
MOJU Environmental Technologies (Attn: Akali Igbene)

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NAVAL AIR STATION, ALAMEDA
ALAMEDA, CALIFORNIA

PRE-DRAFT
ENGINEERING EVALUATION/COST ANALYSIS
REMOVAL ACTION WORKPLANS
SITE 16, FORMER CANS C-2 AREA

Response to Review Comments
from Department of Toxic Substances Control
State Of California- Environmental Protection Agency

Comments from Thomas Lanphar, DTSC, Base Closure Branch: August 4, 1995

1. Comment:

Page 1-1, last paragraph

Both the Department of Toxic Substances Control and the Regional Water Quality Control Board are part of the California Environmental Protection Agency.

Response:

Text has been revised as follows:

The DON is working in cooperation with the USEPA and CAL EPA (Department of Toxic Substances Control and the California Regional Water Quality Control Board) in implementing this removal action.

2. Comment:

Section 2.5 Streamlined Risk Evaluation

Please clarify the locations of sample concentrations used to calculate the level of residual surface soil contamination for lead and PCB. Were all the sample locations used in the calculation, or only the samples taken above one foot?

Response:

Residual concentrations of lead and PCB did not include sample data below 1 foot. Projected post removal action residual concentrations consider all data at 0.5 feet by replacing sample data from excavated areas with post-removal action sample data.

3. Comment 1 for Site 14):

Section 3.4 Applicable or Relevant and Appropriate Requirements.

This section should not only list potential ARARs, but should also describe how the requirements will be met through the removal action. This is especially critical where ARARs identify permit requirements that must be substantively met, although acquiring a permit is not necessary. California Health and Safety Code Section 25358.9 empowers the DTSC to exclude any portion of a response action conducted entirely onsite from the hazardous waste facility permit requirements if both of the following apply:

(1) The removal or remedial action is carried out pursuant to a removal action workplan or a remedial action plan prepared pursuant to H&SC Section 25356.1.

(2) The removal action workplan or the remedial action plan requires that the response action complies with all laws, rules, regulations, standards, and requirements, criteria, or limitations applicable to the construction, operation, and closure of the type of facility at the hazardous substance release site and with any other condition imposed by the DTSC as necessary to protect public health and safety and

Response:

The ARARs section of the EE/CA is intended to outline site specific ARARs that will effect the goals and implementation of the Removal Action. The methodology for achieving the goals and the means for implementing the Removal Action are described in subsequent sections of the EE/CA. More detailed descriptions of site specific ARARs are included in Appendix B of the EE/CA.

Substantive permit requirements, and typical means for achieving substantive permit compliance, will be incorporated into the site-specific Implementation Work Plan (IWP). Substantive permits that may be addressed, if applicable, to the Preferred Removal Action Alternative, include:

(1) Bay Area Air Quality Management District permits, notification, and/or monitoring for:

- (a) control of fugitive dust emissions during excavation and treatment work; and
- (b) monitoring and control of volatile or acidic emissions from treatment system operations.

(2) POTW requirements for discharge of treatment system waters to the sewer system.

(3) SFBRWQCB required engineering controls for the TSTA storage area to prevent run-off of water with contaminated particulates.

Comment 2 for Site 14)

Section 3.4 Potential Applicable or Relevant and Appropriate Requirements

The amendments and additions to California Health and Safety Code by Senate Bill 1706 went into affect on January 1, 1995. This State Law shall not be classified as "To be considered" but instead as applicable law.

Response:

Senate Bill 1706 is not a substantive cleanup standard or standard of control that specifically addresses a hazardous substance, pollutant, contaminant, etc. at a CERCLA site. SB 1706 is a state law addressing procedural and documentation requirements for remedial action plans, and does not belong in the ARARs section as either a TBC or as applicable and/or relevant & appropriate. Therefore, the reference to Senate Bill 1706 will be deleted from the ARAR section of the EE/CA.

4. Comment:

Section 3.5, Removal Action Objectives. second bullet

Please specify that the target residual levels of PCB and lead will be calculated by taking the average surface soil concentrations at the site.

Response:

Target residual levels of PCB and lead will be calculated by taking the average surface soil concentrations at the site.

5. Comment:

Section 4.0, Identification and Screening of General Removal Actions and Technologies

An additional alternative was identified at the July 28, 1995 removal action proposal meeting. This alternative involved the excavation of contaminated soil and the storage of that soil in a soil stockpile area. Once removed to the soil stockpile area, treatability studies will be conducted to determine the appropriate treatment technology. At the Restoration Advisory Board meeting on August 1, 1995, Moju presented the favored alternative as excavation, placement in a CAMU, and treatment by soil washing or solvent extraction. Please clarify the Navy's position on the favored alternative. Further, the DTSC is not certain that establishing a CAMU is the most appropriate regulatory vehicle for the storage and treatment of contaminated soil. A soil storage and treatment area can be established simply through an approved Removal Action Workplan or Interim Remedial Action Plan (see above comment 1).

Response:

The additional alternative, stockpiling of excavated soil in a designated area for later treatment, is the preferred alternative and will be described in the revised Site 16 EE/CA. The designated area is to be called a Temporary Storage and Treatment Area (TSTA). Storage and/or treatment will comply substantively with State/RCRA requirements but the response action is exempt from all permit. Substantive requirements will be detailed in a subsequent Implementation Work Plan.

Implementation of this alternative includes excavating Site 16 contaminated soil, transport of the soil to the TSTA, storage *and treatment* of stockpiled soil in the TSTA. The preferred and expected treatment methodology for the soils is soil washing and metal solubilization. If this process is unsuccessful other alternatives will be examined.

Although the soils subject to this removal action are not hazardous waste, the Navy intends to utilize technical and performance standards for CAMU's (40 CFR-264.552 and Title 22-66264.552) as basis for the design of the TSTA.