

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737
(510) 540-3724

July 1, 1996

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

Dear Ms. Garibaldi:

**WORKPLAN SITE 18 TIME CRITICAL REMOVAL ACTION, NAVAL AIR STATION,
ALAMEDA**

The California Department of Toxic Substances Control (DTSC) has reviewed the Construction Work Plan, Contractor Quality Control Plan, Sampling and Analysis Plan and Site Health and Safety Plan for the Site 18 Removal Action. The removal action at Site 18 began with the cleaning out of over 400 storm catch basins. That action is considered by the DTSC as an emergency action as stated in letters to you dated June 15, 1995 and October 12, 1995. The catch basin removal action is complete. The Navy now plans to use high pressure water jets to wash out storm sewer lines. This action is not considered by the DTSC as a removal action under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) or Chapter 6.8 of the California Health and Safety Code. The DTSC considers this action regular Operation and Maintenance of the Naval Air Station's storm sewer system. This type of maintenance is conducted on storm sewers on a regular basis by municipalities all over the country. Therefore, the DTSC will not comment on the workplan as a document for completing a removal action. We do, however, provide comments on the proposed action in relation to its potential for generating a hazardous waste.

The Navy will generate a waste while conducting maintenance on the storm sewer lines. California Code of Regulations, Title 22, Section 66262.11 requires that any person who generates a waste, as defined in CCR Title 22, Section 66262.2, shall determine if that waste is a hazardous waste. If the waste is hazardous the generator must comply CCR, Title 22, Chapter 12,



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Standards Applicable to Generators of Hazardous Waste. If the Navy determines that they have generated a hazardous waste, the Navy shall not store the waste for over 90 days without a permit or variance issued by the DTSC. Further, the Navy shall not treat and/or dispose of the waste at the Naval Air Station Alameda without obtaining a permit from the DTSC.

According to the workplan, the Navy plans to separate, on site, water from the solids using gravity separation. This process is considered a treatment; however, this type of treatment may qualify for a Conditional Exemption of Special Wastestreams established in California Health and Safety Code Section 25201.5(c). Conditional Exemption for Specified Wastestreams is part of the DTSC Tiered Permitting program. Enclosed you will find information that should assist you in determining if your waste and treatment process qualifies for Conditional Exemption for Specified Wastestreams. The addition of coagulants, however, may disqualify the treatment from receiving a conditional exemption. The enclosed information will also assist you on the procedures for receiving a Conditional Exemption for Specified Wastestreams Tiered Permit.

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

Sincerely,



Thomas P. Lanphar
Project Manager
Base Closure Branch

Enclosure(s)

cc: Ms. Gina Kathuria
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

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cc: Mr. Steve Edde
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

ENCLOSURE

**CONDITIONAL EXEMPTION FOR SPECIFIED
WASTESTREAMS**

**COMMENTS ON THE CONSTRUCTION WORK
PLANS, SITE 18**

**THE ABOVE IDENTIFIED ENCLOSURE IS NOT
AVAILABLE.**

**EXTENSIVE RESEARCH WAS PERFORMED BY
SOUTHWEST DIVISION TO LOCATE THIS
ENCLOSURE. THIS PAGE HAS BEEN INSERTED
AS A PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.**

QUESTIONS MAY BE DIRECTED TO:

**DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132**

TELEPHONE: (619) 532-3676