



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, CA 94105

3 July 1996

Ms. Teresa Bernhard  
NAVFACENCOM  
Engineering Field Activity West  
900 Commodore Drive  
San Bruno, CA 94066-2402

**Re: DRAFT WORKPLANS FOR THE TIME CRITICAL REMOVAL ACTION SITE  
18-STORM DRAIN SYSTEM, NAVAL AIR STATION (NAS) ALAMEDA, 20  
MAY 1996**

Dear Teresa:

The U.S. Environmental Protection Agency (Agency) has completed its technical review of the subject document. The Agency has not provided comments on the legal and procedural aspects of the proposed removal action. The following discussion summarizes the Agency's general technical recommendations.

The proposed use of carbon as an organic chemical "scrubber" for the recycled rinse water seems like an added expense that may not have the desired outcome of removing multiple types of organic compounds. The organic "soup" that will likely be dissolved in the rinse water (including solvents and petroleum related volatile and semi-volatile organic compounds [VOCs and SVOCs]) may not be removed from the water due to the differential binding by carbon for these various classes of compounds. In addition, the aeration resulting from separation on the knock-out box screens and sand filtration treatment is likely to volatilize the VOCs, making the carbon "polisher" act more like another (expensive) filtering device. It is recommended that, before finalization of the treatment train, a test run of the system should be performed to determine if the carbon "polishing" is effective and/or necessary.

Should you have any questions regarding the Agency's review comments or require additional information, please contact Barbara M. Smith at (415) 744-2366, or me at (415) 744-2402.

Sincerely,

A handwritten signature in black ink that reads "Barbara M. Smith for".

James A. Ricks, Jr.  
Project Manager

cc: B. Smith (EPA)  
S. Serda (EPA)  
N. Black (EPA)  
T. Lanphar (CAL EPA/DTSC)  
G. Kathuria (CAL EPA/RWQCB)  
D. Rist (CAL EPA/DTSC)  
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X S. Edde (NAS Alameda)