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Ser 1831.3DW/L6324
5 Aug 1996

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

Subj: RESPONSE TO THE U.S. EPA'S COMMENTS ON THE DRAFT WORK PLAN
FOR THE TIME CRITICAL REMOVAL ACTION AT SITE 18 - STORM DRAIN
SYSTEM AT NAS ALAMEDA

Dear Mr. Risks:

Thank you for your letter, dated July 3, 1996, which provides the comments on the draft work plan for the Site 18 removal action. The following is our response to these comments regarding the use of the activated carbon adsorber in the water filtration system.

The objective of the activated carbon adsorber is twofold. First, it is to produce water suitable for reuse in the high pressure water jets which will be used to clean the sewer lines. Secondly, when spent water must be discharged to the Industrial Waste Treatment Plant (IWTP), the carbon adsorber will ensure that organic content of the water is within the IWTP's acceptance limits.

Since the organic content of the sediment varies throughout the sewer system and it is impossible to determine what portion of the organic contaminants will remain with the sediment as compared to being solubilized by the wash water, the wastewater derived from cleaning the lines may vary widely in organic content and in the type of organic contaminants present. Although the effectiveness of activated carbon varies for the various types of organic contaminants which may be present, activated carbon has some level of affinity for nearly all organic compounds; consequently, the Navy's approach is to initially test the system with this rental activated carbon unit included. If residual volatile organics remaining in the treated water do not cause operating difficulties in the high pressure cleaning jets, influent samples will be analyzed to define the effectiveness of the activated carbon and allow a determination to be made as to whether or not the carbon unit is necessary. On the other hand, the initial tests may indicate the need for additional, perhaps compound specific, organic removal capability.

In summary, the Navy agrees with the EPA's comments. The wastewater derived from cleaning of the sewer lines will be an organic "soup". Further, the contaminants in the "soup" will vary from day to day and from subsystem to subsystem. Empirical and analytical data derived from the initial tests will define the organic removal capabilities which must be incorporated into the system.

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If you have any questions regarding this matter, I can be reached at (415) 244-2526 or
FAX (415) 244-2654.

Sincerely,

Original signed by:

DENNIS WONG
Remedial Project Manager
By direction of
the Commanding Officer

Copies to:

U.S. Environmental Protection Agency (Attn: Ms. Barbara Smith)
California Department of Toxic Substances Control (Attn: Mr. Tom Lanphar)
California Regional Water Quality Control Board (Attn: Ms. Gina Kathuria)
NAS Alameda (Attn: Mr. Steve Edde)
PRC Environmental Management, Inc. (Attn: Mr. Duane Balch)
International Technology Corp. (Attn: Mr. Gary Elston)

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