

CONFIDENTIAL RECORD

PORTIONS OF THIS RECORD ARE CONSIDERED
CONFIDENTIAL AND ARE NOT FOR PUBLIC VIEWING

CLARIFICATION OF NAVY'S INTENT TO ESTABLISH A
CORRECTIVE ACTION MANAGEMENT UNIT OR
TEMPORARY STORAGE AND TREATMENT AREA

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

CONFIDENTIAL

N00236.001326
ALAMEDA POINT
SSIC NO. 5090.3

5090
Ser 1831.1/6348
August 13, 1996

Thomas P. Lanhar
Project Manager
Department of Toxics Substances Control, Region 2
700 Heinz Ave., Suite 200
Berkeley, CA 94710-2737

Dear Mr. Lanphar:

The purpose of this letter is to clarify the Navy's intentions regarding the establishment of a Corrective Action Management Unit (CAMU) or Temporary Storage and Treatment Area (TSTA).

The Navy recognizes that the consolidation of soils, in one location that are subject to institutional controls and monitoring, leaves other areas available for reuse. Further, the use of on site treatment and disposal provides the benefits of economies of scale, promotion of surface soil cleanup, as well as the decreased potential to exposures to the community. In short, the use of a Corrective Action Management Unit (CAMU) and/or a Temporary Storage and Treatment Area (TSTA) are cost effective, reliable and a protective measure, which we intend to implement as the appropriate circumstances arise

The Navy is evaluating the feasibility of designating, within a current Installation Restoration Site, a CAMU for the purposes of consolidation of contaminated soils. This consolidation would expedite the management of low risk soils and may serve to complement on site treatment by providing cost effective and protective alternatives for storage and disposal. This is consistent with concepts developed by the BCT, project team and discussed with the Restoration Advisory Boards Early Action Focus Group.

For example if the appropriate situation arises, a CAMU would be administratively instituted using a RAP/ROD for Site 16 removal action/Site 15 Removal Action Amendment. This RAP/ROD shall also determine the location for the permanent disposal of low risk or treated soils and the establishment of cleanup levels for COPC's. However, to establish these levels background, and Federal and State ARARs must be developed and implemented.

On the other hand, on site permanent treatment units are only cost effective if there intended use is for over 3000 yd³, for over 5 years. To evaluate the need for a permanent on site treatment unit the Navy reviewed all of its current Installation Restoration (IR), and UST data. There are currently 3 IR sites that warrant removal actions. Site 15, a 5000 yd³ site, has already been stored at a TSTA with an approximate cost of monitoring dollars per year. Another site, Site 16, which has approximately 1825 yd³ of PCB and lead contaminated soil is currently in the administrative stages of a removal action. Lastly, Site 8 has some limited PCB and pesticide soils which may require a removal action. The Navy may, in the future, consider a temporary treatment unit for on-site treatment of CERCLA type contaminated soils. There are also several TPH soil piles which have low TPH contamination. There may be an undetermined amount of TPH contaminated soils from fuel line removals. Considering this insufficient information, we can not justify, at this time, the construction of a permanent treatment unit. A temporary treatment unit may be necessary at the of fuel line removal to implement a biopile type treatment for TPH contaminated soils.

CONFIDENTIAL

Ser 1831.1/6348
August 13, 1996

The Navy believes that the proper way to manage low risk and treated soils at NAS Alameda is the implementation of a TSTA and CAMU via the removal action/remedial action regulations and statutes (CERCLA section 121 (d), 40 CFR 300.400) where appropriate, reliable, protective and cost effective. As you are know, the Navy legally developed a Temporary Storage and Treatment Area for an "emergency situation" at Site 15, using these regulations, through an Administrative Memorandum, which was public noticed on October 31, 1995. The establishment of this facility was consistent with ARARs cited in 40 CFR 264, 265, 300.400, 300.415, Title 26 CCR section 66264, as well as the preamble to 58 FR 8658, published on February 16, 1993.

The Navy will consider a CAMU or additional TSTA when these units are a cost effective, reliable and protective alternatives and the Navy has adequate State ARARs and cleanup levels. Thank you for your continued dialog on the CAMU/TSTA. If you have any questions regarding this letter please call me at (415) 244-2516

Sincerely,

ORIGINAL SIGNED BY:

CAMILLE GARIBALDI
Lead Remedial Project Manager

Copy to:
U.S. Environmental Protection Agency (Attn: James Ricks)
NAS Alameda (Attn: Steve Edde)

Blind copy to:
1831, 1831.1, 1831.2, 1831.3, 1831.4
Admin Record
Chron, green
File: NAS Alameda