

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2

700 HEINZ AVE., SUITE 200  
KELEY, CA 94710-2737N00236.001346  
ALAMEDA POINT  
SSIC NO. 5090.3

(510) 540-3724

June 15, 1995

Commander  
Western Division  
Naval Facilities Engineering Command  
Attn: Camille Garibaldi  
900 Commodore Drive  
San Bruno, California 94066-2402

Dear Ms. Garibaldi:

**REMOVAL ACTION AT SITE 18, STATION SEWER SYSTEM AT NAVAL AIR STATION, ALAMEDA**

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) and San Francisco Bay Regional Water Quality Control Board (RWQCB) wish to express our concern over the progress of the Removal Action at Site 18, the Naval Air Station's sewer system and request that a removal action be conducted at this site prior to the 1995/1996 rainy season. The DTSC and RWQCB have identified the Site 18 Removal Action as our highest priority in terms of upcoming removal actions. Some of the highest levels of contamination found at NAS Alameda has been found in the catch basins of the storm sewer system. In some of the catch basins the contaminants are above levels which define a hazardous waste. The contamination in the storm drains constitutes an imminent and substantial threat to public health and the environment. Specifically, the storm drains are a direct conduit for contamination to move to the San Francisco Bay. We are concerned because you have indicated that funds may not be currently available to complete this action.

The DTSC and RWQCB consider this removal action to be urgent. Immediate action is necessary so that the contamination does not continue to endanger the ecology of the San Francisco Bay. This action must begin before the next winter rainy season. Therefore, the removal action must be completed prior to November 1, 1995. Because the removal action must be initiated within six months, requirements identified in 40 CFR, Section 300.415(b)(4), including an Engineering Evaluation and Cost Analysis are not necessary. The DTSC and RWQCB, however, request that a workplan and schedule for completing the removal action by November 1, 1995 be submitted to DTSC and RWQCB for approval by July 31, 1995. The DTSC and RWQCB are willing to negotiate the July 31, 1995 submittal date, however, the sediment from the storm drains must be removed by November 1, 1995.

Ms. Camille Garibaldi  
June 15, 1995  
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If you have any questions regarding this letter, please call me at (510) 540-3809.

Sincerely,



Thomas P. Lanphar  
Project Manager  
Base Closure Branch

cc. Mr. James Nusrala  
Regional Water Quality Control Board  
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Base Environmental Coordinator  
Alameda Naval Air Station  
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U.S. Environmental Protection Agency  
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Early Action Focus Group Chair  
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