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Ser 1831.1/L6343
12 Sep 1996

Mr. Daniel Murphy/Tom Lanphar
Project Manager
State of California Environmental Protection Agency
Site Mitigation Branch
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Subj: IDENTIFICATION OF STATE "APPLICABLE OR RELEVANT AND APPROPRIATE
APPROPRIATE REQUIREMENTS" (ARARs) FOR THE REMEDIAL INVESTIGATION
AND FEASIBILITY STUDY (RI/FS) FOR OPERABLE UNITS ONE, TWO, THREE,
AND FOUR AT NAVAL AIR STATION ALAMEDA, ALAMEDA, CA.

Dear Mr. Murphy:

Pursuant to our previous discussions, and the letters dated October 24, 1994, October 4, 1995, March 5, 1996 and consistent with § V.A.2.c of August 1, 1990, Memorandum of Understanding between the Department of Health Services, the State Water Resources Control Board, and the Regional Water Quality Control Boards for the Cleanup of Hazardous Waste Sites, this letter is the fourth request that the Department of Toxic Substances Control, as the lead agency for the State of California, identify potential State chemical-specific and location-specific ARARs for Operable Units 1 through 4 (Installation Restoration (IR) Sites 1, 2, 3, 4, 5, 6, 7, 7B, 7C, 8, 9, 10A, 10B, 11, 12, 13, 14, 15, 16, 17, 18, 19, and 20) at NAS Alameda, California.

In the Remedial Investigation/Feasibility Study Data Transmittal Memoranda submitted to you in January 1995 and June 1995, and the draft Ecological Assessment submitted to you in February 1994, as well as the enclosed list of Site Characterization Documents and Activities, available site characterization data has been presented with respect to Operable Units 1 through 4. The site characterization data should allow you to specifically identify State Chemical-specific and location specific ARARs. Please note that a similar request for action-specific ARARs will be transmitted after remedial alternatives have been screened and developed for the Detailed Analysis of Alternatives phase of the Feasibility Study (FS). Projects in Remedial Investigations and Feasibility Studies for all four Operable Units such as groundwater modeling are near cease work. These projects are critical to the Remedial Investigation and Feasibility and are delayed due to the need for more specific State ARARs.

The Department of the Navy is requesting that the State of California identify any other criteria, advisories, guidance, and proposed standards that the State requests be considered for the above identified Operable Units.

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Timely identification of potential State ARARs is required under Section 121 (d)(2)(A) of CERCLA and under the National Contingency Plan (NCP), 40 CFR §§ 300.400 (g) and 300.15 (d) and (h). Experience to date around the country has shown that a failure to identify ARARs with sufficient precision, early in the RI process, can cause severe disruptions in timely implementation of remedial action. To ensure timely and complete ARARs identification for the Operable Units above, please include the following information:

1. A specific citation to the statutory or regulatory provision(s) for the proposed State ARAR and the date of enactment or promulgation of the provision.
2. A description of the proposed State ARARs specific numeric, effluent, or emission limitations, hazardous substance/constituent action or cleanup levels.
3. A brief description of why the proposed State ARARs are applicable or relevant and appropriate to the Operable Units.
4. If the State believes its proposed ARAR is more stringent than the corresponding Federal ARAR, please provide the rationale and technical justification for this position.

The Department of Toxic Substances Control has provided the Navy with preliminary documentation which, while beneficial, lacks specificity and detail which are required to adequately assess regulatory provisions. Consistent with 40 CFR § 300.515 (h)(2), we request a written response within 30 calendar days of receipt of this letter. Upon receipt of your State ARAR evaluation, we can schedule a meeting to discuss the specific details. Please direct any technical questions you may have concerning this request to Ms. Camille Garibaldi, Code 1831, at (415) 244-2516.

Sincerely,

Original signed by:

HENRY C. GEE
Manager, BRAC Environmental Programs
By direction of
the Commanding Officer

Blind copies to:
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