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Ser 612.4/L8001  
02 Oct 1997

Mr. Thomas Lanphar,  
Project Manager  
California Environmental Protection Agency  
Department of Toxic Substances Control, Region 2  
Site Mitigation Branch  
700 Heinz Avenue, Bldg. F, Suite 200  
Berkeley, California 94710

Subj: IDENTIFICATION OF STATE APPLICABLE OR RELEVANT AND APPROPRIATE  
REQUIREMENTS (ARARs) FOR REMOVAL ACTIONS AT SITES 1, 2, 5, AND 10, AT  
ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Lanphar:

As the State has been informed, the Navy is contemplating a removal action of radiological material at Sites 1, 2, 5 and 10 located in Alameda Point on the grounds of the former Alameda Naval Air Station. To perform this action, the Navy will comply to the extent practicable with all Applicable or Relevant and Appropriate Requirements (ARARs) of California environmental laws. This letter is a follow-up to our previous discussions on ARARs, and is consistent with Section V.A.2.c of the 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 (RWQCB) for the Cleanup of Hazardous Waste Sites. By referencing pertinent reports and other materials in the accompanying attachment, we are providing you with additional information on site conditions and proposed actions to assist you in identifying ARARs.

We request that the Department of Toxic Substances Control (DTSC), as the lead regulatory agency for the State of California, identify potential State chemical, location, and action-specific requirements for two landfill sites (Sites 1 and 2) and two building sites (Sites 5 and 10) at Alameda Point more fully described below. Chemical-specific requirements are health-, technology-, or risk-based numeric values that establish the acceptable amount or concentration of a radiological chemical that may be found in, or discharged to, the ambient environment. Location-specific requirements are restrictions placed on the concentrations of hazardous substances or the conduct of activities solely because they occur in special locations. For example, the requirement that hazardous waste storage facilities located within 100-year flood plains must be designed, constructed, operated and maintained to avoid washout is considered a location-specific requirement. Action-specific requirements are technology- or activity-based requirements or limitations on actions taken with respect to hazardous waste.

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The landfill sites (IR Site 1 and Site 2) are along the western boundary of the facility, whereas Building 5 and 400 (IR Sites 5 and 10) are located in the south-central portion of the facility. Since 1992, several remedial investigation data summary reports, and more recently radiation survey reports, have been provided to the DTSC and are referenced in the accompanying attachment (Attachment A). Recent radiation survey work at these sites, and discussions with you and the BRAC Cleanup Team (BCT) for Alameda Point, have led the Navy to evaluate the potential threat of radiation exposure from radioactive materials in storm drain lines, and landfill soils, and several other areas of suspected radioactive contamination. Based on recent discussions between the Navy, DTSC, and DHS, and based on the data provided in the documents listed, the Navy proposes to conduct a removal action. The proposed removal action includes radiological removal of known anomalies at Sites 1 and 2, and the removal and/or isolation of radiologically-impacted drain lines within and beneath buildings at Sites 5 and 10.

The Navy is requesting that the State respond in a timely manner (preferably within 7 days) so that the requirements may be considered for the removal action. Exact references or citations to the statutes and regulations, or copies of pertinent provisions of these State requirements (as well as references to other criteria, advisories, guidance, and proposed standards that the State requests to be considered for the above-identified sites) are necessary. This information will greatly facilitate our ability to evaluate these requirements as ARARs for the sites listed above. To ensure timely and complete ARARs identification for the site listed above, the Navy requests that you please include the following information:

1. A specific citation to the statutory or regulatory provision(s), or copies of pertinent provisions of these State requirements, and the date of enactment of promulgation.
2. A brief description of the reason why the State requirement is applicable or relevant and appropriate to the particular IR site.
3. A description of how the State requirement would apply or be relevant and appropriate to the sites and to the proposed removal action. Please include specific numeric discharge, effluent, or emission limitations; hazardous substance/constituent action or cleanup levels, and so forth, if the State intends to take the position that the State requirement includes such limitations, and levels.
4. If the State believes its requirements are more stringent than the corresponding Federal requirements, please provide the rationale and technical justification for this position.

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5. If the State determines that there is not enough information to fully respond to the Navy's request, please identify any additional information that would be required to support identification of State ARARs and their application.

The Navy will examine these requirements in order to determine whether they are applicable or relevant and appropriate to the sites at the facility. CERCLA and its implementing regulation, the National Contingency Plan, require the Navy to comply with ARARs to the extent practicable, considering the exigencies of the situation. It is important to keep in mind, however, that some requirements identified by the State may be determined not to be ARARs or may be determined to be impracticable to meet or may qualify for a waiver.

Please direct any technical questions that you may have concerning this request to the undersigned at (415) 244-2516.

Sincerely,

**ORIGINAL SIGNED BY**

CAMILLE GARIBALDI  
Lead Remedial Project Manager

Enclosed: Attachment A

Copy to:

California Regional Water Quality Control Board (Attn: Ms. Lyn Suer)  
California Department of Fish and Game (Attn: Ms. Susan Ellis)  
US Environmental Protection Agency, Region IX (Attn: Mr. James Ricks, Jr.)  
US Fish & Wildlife Services (Attn: Mr. Jim Haas)  
Bay Area Air Quality Management District (Attn: Nora Lew)  
Bay Conservation and Development Commission (Attn: Mr. Steve McAdam)  
National Oceanic & Atmospheric Administration (Attn: Ms. Laurie Sullivan)  
CSO Alameda Point (Attn: Mr. Steve Edde)  
CSO Alameda Point (Attn: Mr. Roger Caswell)  
Radiological Affairs Support Office (Attn: Mr. Lino Fragoso)  
Tetra Tech EM Inc. (Attn: Mr. Neal Hutchison/Peter Solberg)

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Blind copies to:

702.35, 612.5, 612.6, 612.4, 612.11, 09CRG

Writer: George Kikugawa, 1831.2GK, X2549

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Activity File: NAS ALAMEDA (File: L7 GK.DOC) ab)

Admin. REcords:(three (3) copies)

## Attachment A

- PRC Environmental Management, Inc. (PRC) and James M. Montgomery, Consulting Engineers, Inc. (JMM). 1992. "NAS Alameda, Alameda, California. Data Summary Report RI/FS Phases 2B and 3, Final." October 27.
- PRC and Montgomery Watson (MW). 1993. "NAS Alameda, Alameda, California. Solid Waste Water Quality Assessment Test (SWAT) and Data Summary Report for RI/FS Phases 5 and 6, Final." April 30.
- PRC and MW. 1993. "NAS Alameda, Alameda, California. Data Summary Report RI/FS Phases 1 and 2A, Final." August 25.
- PRC and MW. 1995. "NAS Alameda, Alameda, California. Data Summary Report Background and Tidal Influence Studies and Additional Work at Sites 4 and 5, Final." October 16.
- PRC and MW. 1996. "NAS Alameda, Alameda, California. Remedial Investigation/Feasibility Study, Data Transmittal Memorandum, Sites 4, 5, 8, 10A, 12, and 14, Final." April.
- PRC and MW. 1996. "NAS Alameda, Alameda, California. Remedial Investigation/Feasibility Study, Data Transmittal Memorandum, Sites 1, 2, 3, Runway Area, 6, 7A, 7B, 7C, 9, 10B, 11, 13, 15, 16, and 19, Final." May.
- PRC. 1996. "NAS Alameda, Alameda, California. Radiation Survey and Field Sampling Work Plan, Final." December.
- PRC. 1997. "NAS Alameda, Alameda, California. Addendum to the Remedial Investigation/Feasibility Study, Data Transmittal Memorandum, Site 1 and Site 2 Radiation Survey Report, Final." January.
- PRC. 1997. "NAS Alameda, Alameda, California. Radiation Survey Report, Pre-Draft." February 28.