



# Department of Toxic Substances Control



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Agency Secretary  
California Environmental  
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Gray Davis  
Governor

October 17, 2003

Mr. Luciano A. Ocampo, PE  
Remedial Project Manager  
Department of the Navy  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

**NOTICE OF DEFICIENCY, AMENDMENT TO THE CLOSURE PLAN FOR THE INDUSTRIAL WASTE TREATMENT PLANT (IWTP) 32 , NAVAL AIR STATION ALAMEDA, CALIFORNIA, NOW KNOWN AS ALAMEDA POINT, EPA ID # CA 2 170 023 236**

Dear Mr. Ocampo:

The Department of Toxic Substances Control (DTSC) received the Amendment to the Closure Plan for the Industrial Waste Treatment Plant (IWTP) 32 dated September 8, 2003. DTSC has reviewed the document and has the following comments:

1. Figure 3 depicts several tanks along the southern wall of the building. The Navy needs to describe what were stored in these tanks and indicate if the tanks were ever used. In addition, Figure 3 should include an arrow indicating the groundwater flow direction in the area of IWTP 32. If the groundwater flow direction is away from the existing sample locations, additional groundwater samples are required to address the data gap.
2. Section 3.3, Summary of Subsurface Investigation Results
  - A. DTSC agrees with the conclusion that that the existing liner under

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

IWTP 32 should not be breeched.

- B. In order for DTSC to agree that the existing sample results indicate minimal impact to the environment from the unit, Figure 3 needs to show sample locations and results along the southern or eastern sides of the building. If no samples have been collected along the southern and eastern sides of IWTP 32, DTSC recommends 2 soil sample locations spaced along each of the eastern and southern walls to adequately investigate the buildings perimeter. Sampling should be performed using the same techniques used to collect the existing samples with method 5035 being employed for the collection of volatile organic compound (VOC) samples. Analysis should include VOCs, metals, and hexavalent chromium.
3. Page 8, Section 4.0, Decontamination Procedures for Equipment, Structures, and Buildings – This section should include estimates of the quantities of materials that may be generated and shipped offsite for disposal.
  4. Section 9.0, Closure Performance Standards – DTSC recommends that this section indicate the tank and equipment dismantling will be sufficient to ensure they will not be re-usable.

Please address these comments in a Revised IWTP 32 Closure Plan Amendment and submit the document by November 24, 2003. If you have any questions or comments concerning this letter please contact Mr. Dean Wright of my staff at (916) 255-6528.

Sincerely,



For:  
Wei Wei Chui, Section Chief  
Standardized Permitting and Corrective Action Branch

cc: next page

Mr. Luciano A. Ocampo

October 17, 2003

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AW: 3 copies 10/10/03