



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
1455 FRAZEE RD, SUITE 900
SAN DIEGO, CA 92108-4310

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MAY 22 2008

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Chip Gribble
Project Manager
State of California Environmental Protection Agency
Department of Toxic Substance Control
Region 9
Site Mitigation Branch
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Dear Mr. Gribble:

Subj IDENTIFICATION OF STATE "APPLICABLE" OR "RELEVANT AND APPROPRIATE" REQUIREMENTS (ARARS) FOR THE NON-TIME-CRITICAL REMOVAL ACTION TO ADDRESS MUNITIONS AND EXPLOSIVES OF CONCERN (MEC) WITHIN THE PRODUCTION MANUFACTURING AREA (PMA) AND SOUTH SHORE AREA (SSA) AT THE FORMER MARE ISLAND NAVAL SHIPYARD, VALLEJO, CALIFORNIA

Navy policy requires removal actions to comply with ARARs to the extent practicable. Pursuant to our previous discussions and Navy policy, we are hereby requesting that the Department of Toxic Substances Control (DTSC) as the lead agency for the State of California, identify potential State ARARS for Production Manufacturing Area (PMA) and South Shore Area (SSA) at the Former Mare Island Naval Shipyard. ARARs identified by the State will be considered and evaluated during the preparation of the Engineering Evaluation/Cost Assessment (EE/CA) for the proposed Non-Time-Critical Removal Action to address Munitions and Explosives of Concern (MEC) within the PMA/SSA.

The site data contained in the Final Geophysical Investigation for the PMA/SSA of May 2008 should allow you to begin to identify, with some specificity, State chemical-specific and location -specific ARARs.

The following information is being provided to aid the State in their identification of potential action-specific State ARARs. The purpose of this removal action is to address the potential for MEC within the PMA/SSA based on the results of the geophysical investigation.

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Alternative removal action approaches to address the potential for MEC within the PMA/SSA will be evaluated for this NTCRA to decrease the overall risk at the site. The different alternatives being developed for evaluation include combinations of the most likely general response actions such as land use controls, engineering controls, excavation, screening, detonation, and disposal.

The State of California may also identify any other criteria, advisories, guidance, and proposed standards that the State requests be considered (TBCs) for the above-identified IA, which will be addressed by this removal action.

Timely identification of potential State ARARs is crucial to the success of the proposed Removal Action. Experience to date around the country has shown that a failure to identify ARARs with sufficient precision, early in the Removal Action selection process, can cause severe disruptions in timely implementation of the Removal Action. To ensure timely and complete ARARs identification, for each individual IA listed above please include the following information:

1. A specific citation to the statutory or regulatory provision(s) for the potential State ARAR and the date of enactment or promulgation.
2. A brief description of why the potential State ARAR is applicable or relevant and appropriate to the particular MRP Site (or IR Site).
3. A description of how the potential State ARAR would apply to potential Removal Action, including: specific numeric discharge, effluent, or emission limitations; hazardous substance/constituent action or cleanup levels; etc., if the State intends to take the position that the potential State ARAR includes such limitations, levels, etc.
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.
5. If the State determines that there is not enough information to fully respond to our request, please identify any additional information that would be required to support identification of State ARARs.

We are requesting that you send a response via first class mail addressed to me and postmarked within 30 calendar days of receipt of this request.

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Please direct any technical questions that you may have concerning this request to either Mr. Steven Peck at (619) 532-0786, or me (619-532-0967), and any legal questions to Associate Counsel Mr. Jan Whitacre (619-532-0910).

Sincerely,



MICHAEL S. BLOOM
BRAC Environmental Coordinator
By direction of the Director

Copy to:
Ms. Carolyn d'Almeida
U.S. Environmental Protection Agency
Mail Code SFD 8-1
75 Hawthorne Street, 9th Floor
San Francisco, CA 94105-3901

Mr. Brian Thompson
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San Francisco Bay Region
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