



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
1455 FRAZEE RD, SUITE 800
SAN DIEGO, CA 92108-4310

N00221_001226
MARE ISLAND
SSIC NO. 5090.3.A

5090
Ser BPMOW.elb/0311
MAR 6 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

SUBJECT: IDENTIFICATION OF STATE "APPLICABLE" OR "RELEVANT AND APPROPRIATE" REQUIREMENTS (ARARS) FOR THE NON-TIME-CRITICAL REMOVAL ACTION AT BUILDING 742, FORMER DEGREASING PLANT, INVESTIGATION AREA C2 AT THE FORMER MARE ISLAND NAVAL SHIPYARD, VALLEJO, CALIFORNIA

Dear Mr. Gribble:

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 Building 742, Former Degreasing Plant, Investigation Area (IA) C2. 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 at the site.

In our Final Expanded Site Inspection Report Building 742, Former Degreasing Plant, Investigation Area C2 dated December 7, 2007, we transmitted to you the final site characterization data for IA C2. In addition, we discussed this data during several Base Realignment and Closure (BRAC) Cleanup Team meetings. The site characterization data 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 source of the volatile organic compounds (VOCs) detected during previous actions and investigations, including storm drain cleaning of the storm water system in 2002. Contaminants such as trichloroethene (TCE), tetrachloroethene (PCE), chlorobenzene, and vinyl chloride (VC) were detected in samples from Manhole D1-C85. The initial SI report identified the former degreaser pit operation area as the most likely primary source of the VOCs in soil and groundwater.

5090
Ser BPMOW.elb/0311
MAR 6 2008

The manhole D1-C85 was identified as a secondary source for the contaminants. An expanded SI was conducted in 2004 and 2005 to conduct further evaluation of the area including additional soil and groundwater sampling to determine the source of the contamination.

The following two alternative removal action approaches for Building 742,-Former Degreasing Plant Area, in IA C2 will be evaluated for this NTCRA to decrease the overall risk at the site.

1. The first alternative is through excavation and disposal of soils within the former Degreasing Plant Area and in the vicinity of Manhole D1-C85, removal of a crushed sewer line, and removal of an 8-inch drain pipe.
2. The second alternative would include the work set forth for the first alternative and add a groundwater response in the form of in-situ bioaugmentation in the excavation areas.

Further details on the initial and expanded SI are contained in the Final Expanded Site Inspection Report, Building 742, Former Degreasing Plant, IA C2, dated 7 December 2007.

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 OU (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.

5090
Ser BPMOW.elb/0311
MAR 6 2008

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. Please direct any technical questions that you may have concerning this request to the Lead Remedial Project Manager Ms. Elizabeth Barr (619-532-0903), or myself (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
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612