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Ser 09EC2TL/L5047
19 Jan 1995

Regional Water Quality Control Board
San Francisco Bay Region
Attn: Ms. Gina Kathuria
2101 Webster Street , Suite 500
Oakland, CA 94612

Dear Ms. Kathuria,

Subj: CRITERIA FOR PLACEMENT OF UNDERGROUND STORAGE TANKS (USTs)
IN UST PROGRAM VS THE INSTALLATION RESTORATION (IR) PROGRAM

Dear Ms. Kathuria:

In response to your letter dated October 31, 1994, this letter is provided to present the Navy's position in determining the appropriate program to handle USTs at Mare Island.

In general, the Navy intends to handle all USTs in the UST program. This shall always be applied from the time of tank removal through the completion of source control activities. With consideration of the criteria provided, the Navy believes the following sites may be transferred to Department of Toxic Substances Control (DTSC) lead when the following conditions occur. After removal and source control activities at sites where the USTs contained non-petroleum hazardous constituents which threaten human health, groundwater or the environment, the sites may be moved into the IR program based upon discussion with the Regional Water Quality Control Board (RWQCB) and DTSC on a case by case basis.

To this end, the Navy has identified the following sites that should be removed from the UST program and should be handled in the IR program. These sites include USTs 225 (IR Site 15); 334-1, -2, -3 and -4 (IR Site-09); and 565-1, -2, -3, and -4 (IR Site 18).

The following UST sites are in or within IR sites but there is no evidence of commingling plumes or hazardous constituents. Consequently, the Navy considers at this time that these sites are more appropriately handled within the UST program. These sites include USTs IWPT (located close to IR Site 24); 693-D07, -D08, D-09 and D10 (located close to IR Site 03).

We look forward to discussing these with you in our meeting planned on January 31, 1995 at Building 459 at 1:00 PM at Mare Island Naval Shipyard. If you have any question, please call Mr. Terry Lau at (415) 244-2589.

Sincerely,

Original signed by:

BAHA Y. ZARAH
Head, Environmental Compliance UST Section
By Direction of
the Commanding Officer

Copy to:
NAVSHIPYD Mare Island (Attn: Code 106.31, C. Krettecos)