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Ser 1142C/ALAMEDA/MAS

17 AUG 1987

Environmental Protection Agency
Region IX
Attn: Nancy Woo
215 Fremont Street
San Francisco, CA 94105

Dear Ms. Woo:

Enclosure (1) is the Navy's response to your letters dated June 30, 1987 and July 14, 1987 which provided your comments regarding our Naval Air Station, Alameda, Initial Assessment Study and Verification Step Reports prepared under our former Navy Assessment and Control of Installation Pollutants (NACIP) Program, now referred to as the Navy Installation Restoration (IR) Program. As discussed in your recent phone conversation with Chloe Jue of my staff, we are providing you with the majority of our responses (enclosure (1)). Additional comments will be submitted to you at a later date.

Should you have any questions regarding our response, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Chloe Jue, 1142C, (415) 877-7493).

Sincerely,

R. E. Ramos
By direction

Encl:

(1) Response to EPA Comments,
Naval Air Station, Alameda

Copy to:

NAS Alameda (Code OL-1)
California Department of Health Services (Don Cox)
California Regional Water Quality Control Board (Ken Theisen)
Canonie Environmental (Lance Geselbracht)

Blind copy to:

→ 1142C
1142E

WRITER: C. Jue/1142C/7494
FYPIST: ALAMEDA/MAS Aug 87/Ser 2408S
FILE: ALAMEDA/MAS

#2408S
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RESPONSE TO EPA COMMENTS
NAVAL AIR STATION, ALAMEDA

Quality Assurance/Quality Control. QA/QC procedures will be consistent with the EPA Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans (December 29, 1980).

Tritium. Evidence of tritium disposal at NAS Alameda was not found during the Initial Assessment Study. We are not aware of any evidence or record of such releases at NAS Alameda.

INITIAL ASSESSMENT STUDY

General. The Confirmation Study Ranking System is described in the attached document NEESA 20.2-42.

Page 6-1. (Aircraft Intermediate Maintenance Department) Hazardous materials were handled and stored in the AIMD area, but AIMD personnel who were interviewed during the Initial Assessment Study (IAS) were not aware of any spills. However, additional sampling will be incorporated into the workplan for verification.

Page 6-3. (Air Operations) Operations such as fuel dumps prior to emergency landings and crashes are unlikely to deposit significant amounts of fuel on the ground. Fuel dumps would not have occurred over the air station, and crashes would have been washed with water during clean up. Further investigation is not warranted.

Page 6-4. (Navy Exchange: Service Station - Building 459) Further investigation will be detailed in the Workplan.

Page 6-8. (Pest Control Area - Building 114) Further investigation will be detailed in the Workplan.

Page 6-10. (Naval Air Rework Facility - Buildings 5, 360, 410) Buildings 5 and 410 were not recommended for further study because no releases were observed. However, further investigation will be detailed in the Workplan.

Page 6-23. (Shops - Building 360) Further investigation of the Building 360 shops will be detailed in the Workplan.

Page 6-27. (Building 400 and 530 - Missile Rework Operations) Further investigation will be detailed in the Workplan.

Page 6-29. (Mercury Waste - Building 14) Further investigation will be detailed in the Workplan. The West Beach Landfill is already proposed for further study.

Page 6-29. (Waste Petroleum Products) Petroleum products were disposed of at the West Beach Landfill which is proposed for further study.

Page 6-30. (TAC Rags) Further investigation will be detailed in the Workplan. TAC rags were disposed of at the West Beach Landfill which is already proposed for further investigation.

Page 6-32. (Port Operations) The piers are dredged nearly annually and significant contamination from the area would have been removed. Dredging is in accordance with the Army Corps of Engineers Regulations, and testing of the sediment is required prior to disposal.

Page 6-34. (Defense Property Disposal Office) Further investigation will be detailed in the Workplan.

Page 6-36. (Building 114) Further investigation will be detailed in the Workplan.

Page 6-43. (Supervisor of Shipbuilding, Conversion and Repair) Wastes were disposed of in the West Beach Landfill which is already proposed for further investigation.

Page 6-49. (Separator Pits) Further investigation will be detailed in the workplan.

Page 6-67. (Industrial Wastewaters) A response will be provided at a later date.

Page 6-77. (Industrial Pretreatment Plants) No leaks have been reported, therefore no further investigation is planned. When these structures are removed or repaired, soil sampling will be recommended.

Page 3-2. (Estuary - Site 8) The area is dredged nearly annually and the contaminated sediment would have been removed. Therefore, no further investigation is planned. Vigorous flushing action, mixing action, and dilution capability would also have mitigated any effect.

Page 3-3. (Piers and Turning Basin, Fuel Lines, Oil Refinery and Fire Training Area) Further investigation will be detailed in the workplan for the oil refinery and fire training areas. The piers and turning basin are dredged almost annually and any significant contamination would have been removed. No further action is planned for this site.

Underground Storage Tanks

An underground storage tank precision testing investigation is currently being conducted at NAS Alameda. A final report summarizing our findings is scheduled for completion in September 1987.

POLYCHLORINATED BIPHENYLS

A response will be provided at a later date.

VERIFICATION STUDY

A response will be provided at a later date.

WORKPLAN

The Characterization Step-Work Plan which was reviewed by EPA was prepared by our previous consultant. Our new consultant who will be conducting the Remedial Investigation will revise and expand the existing workplan to include additional investigation. Your comments will be considered in the development of the revised workplan.