

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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January 26, 1993



Lieutenant Mike Petouhoff
Environmental Officer
Naval Air Station, Alameda
Facilities Management Office - Code 52
Building 114
Alameda, California 94501-5000

Dear Lt. Petouhoff:

SCOPE OF SERVICES FOR REMOVAL OF CONTAMINATED SOIL AND FLOATING PRODUCT AT THE U.S. NAVAL AIR STATION, ALAMEDA

The Department of Toxic Substances Control (DTSC) has reviewed the Scope of Services for the removal of contaminated soil and floating product. Please incorporate the following comments into the final Scope of Services report.

1. Page 1, Section 1.0, Introduction, second paragraph

The Fuel Spill Investigation Report, dated December, 1991 referenced in the text and included in Appendix B is a draft. A final Fuel Spill Investigation Report, Dated March 30, 1992 is available and should replace the draft version used in this report.

2. Page 1, Section 1.0, Introduction, third paragraph

The Scope of Services (Work Plan) is also intended as a removal action plan for the removal of floating product from monitoring well MIMF-01. This should be made clear in the introduction.

3. Page 1, Section 1.2, Location

The location of well MIMF-01 should be described in this section.

4. Page 2, Section 1.3, Background

A short background description of the floating product contamination in well MIMF-01 should be included in this section.

5. Page 3, Section 1.5.2, Equipment

Figure 4 is not included in the report copy given to DTSC.

6. Page 4, Section 2.2, Excavation Methodology

Lieutenant Mike Petouhoff
January 26, 1993
Page Two

Figure 5 is not included in the report copy given to DTSC.

7. Page 5, Section 2.2, Excavation Methodology, first bullet on page 5

What is the depths of the fuel line and the waste water line?

8. Page 5, Section 2.3, Interim Removal Action Goals

Earlier discussions between the Navy and DTSC, on the removal of contaminated soil at building 397, centered on the excavation of an envelope of soil north and east of building 397. Cleanup levels were not discussed between Navy and DTSC. Cleanup levels may apply to the removal of soil; however, 10,000 ppm for JP-5 and Total Recoverable Petroleum Hydrocarbons (TRPH) is considered too high. The cleanup levels must be reduced to 1,000 ppm for both JP-5 and TRPH. If, however, the entire envelop of soil is excavated before the 1,000 ppm cleanup level is obtained, the removal action can be considered complete. Remaining contamination will then be mitigated as part of the base wide remediation effort.

9. Page 6, Section 2.4, Volume of Soils

The DTSC understood that the amount of soil excavated could be as much as 4,000 cubic yards. Will the contractor be prepared to excavate greater than 2,100 cubic yards of soil?

10. Page 7, Section 2.9, Installation of Free Product Recovery System

On December 11, 1992, WESTDIV submitted to the DTSC a Scope of Work for the removal of floating product at well MIMF-01. The Scope of Work was developed in cooperation with the DTSC. This Work Plan does not address items identified in the Scope of Work, specifically:

1. The Work Plan does not estimate the rate of floating product recovery. Information on floating product recovery should have been obtained after several days of hand bailing floating product from well MIMF-01. This information should be used to determine pumping rates. The pumping rate must be below the floating product recovery rate. The floating product recovery rate will decrease as product is removed. The contractor must monitor the recovery of the well and adjust the pumping rate accordingly.

Lieutenant Mike Petouhoff
January 26, 1993
Page Three

2. More detail is required on the operation of the float skimmer pump and storage system.
3. The Work Plan should include monitoring methodology and criteria to determine when the floating product recovery will be discontinued. The Work Plan should also include post-removal monitoring methodology and schedule.
4. A proposed approach for disposing of the floating product on or off-site should be included in the Work Plan. The Work Plan shall include and evaluation of on or off-site disposal or recycling facilities, and a recommendation on the disposal or recycling facility. The floating product shall be disposed of within 60 calendar days of floating product collection.

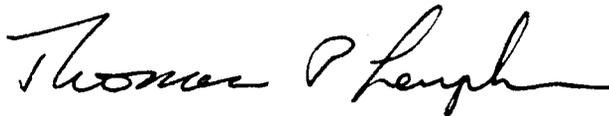
Further details on the work to be performed by Navy's contractor is included in the December 11, 1992 Scope of Work. This document should be reviewed and any applicable portions must be incorporated into the Work Plan.

11. Page 9, Section 3.0, Health and Safety

The Work Plan states that it is anticipated that the entire project will be conducted in Level D. The Health and Safety Plan, however, states that PPE provided to employees will effectively eliminate for skin contact and reduce potential inhalation to below the PEL. The contractor must monitor the air for aromatic hydrocarbons and be prepared to upgrade to Level C if necessary.

If you have any questions regarding these comments or require further assistance please call me at (510) 540-3809.

Sincerely,



Thomas P. Lanphar
Associate Hazardous Materials
Specialist
Site Mitigation Branch

cc: See Attached List

Lieutenant Mike Petouhoff
January 26, 1993
Page Four

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