

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

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OAKLAND, CA 94612-2737

(510) 540-3809

March 29, 1993



Ms. Louise T. Lew
Code 1811
Naval Facilities Engineering Command
Western Division
900 Commodore Drive
San Bruno, California 94066-2402

Dear Ms. Lew:

**PROPOSES SCHEDULE FOR RI/FS ACTIVITIES AT NAVAL AIR STATION,
ALAMEDA**

The Department of Toxic Substances Control (DTSC) has reviewed the Proposed Schedule for RI/FS Activities at Naval Air Station Alameda. This schedule was submitted by the Navy on March 4, 1993. The schedule was requested by the DTSC as a requirement of the Remedial Action Order issued by DTSC to Naval Air Station, Alameda on June 30, 1988.

The following comments should be incorporated into a revised RI/FS Schedule.

1. The schedule should be presented in two formats. Presently, the schedule is in the form of a gant chart. That format is acceptable; however, a list of deliverable documents should also be organized as a table. Documents should be categorized into primary and secondary documents. Submittal dates for draft and draft final documents need to be included in the table. Submittal dates for draft and final secondary documents must also be included; however, these dates may be targets.
2. The DTSC would like to clarify the terminology required for draft and final documents. A 'draft' document is the first document submitted to the State. The draft document is reviewed, commented upon, and returned to the Navy. The Navy then responds to the State's comments and makes revisions to the draft document. A 'draft final' document is then submitted to the State. Once the State has approved the 'draft final', the document becomes final.

3. The State's document review period shall be as follows:

- o draft Work Plans and Secondary Documents 45 days
- o draft RI Report and the FS Report 60 days
- o draft final Reports 30 days

These review periods may be extended by the State if additional time is required.

4. The schedule shall include all work planned between now and the Remedial Action Plan (RAP). This includes work planned for this year, including Work Plans for Phases 2B and 3, Phases 5 and 6, addendums on previous RI Work Plans, and all removal actions. The removal action process is completed with the submittal of a Removal Action Report.
5. Currently, the Navy is not developing a Field Sampling Work Plan for Phase 2A. The DTSC would like to emphasize the importance of completing a Phase 2A Field Sampling Work Plan before September 1993. The Phase 2A Work Plan must be completed before the CTO for Follow-On Field Work is negotiated. A Field Sampling Work Plan for Phase 2A must be included in the Schedule. This work must begin by April 1, 1993.
6. The title for Phases 5 and 6 should include "Landfill Investigations."
7. The use of the 'Phase' terminology shall cease with the writing of the RI Report (i.e. there shall not be a Phase 7 or Phase 8).
8. Data for the RI Report shall be submitted to the State prior to the submittal of the draft RI Report. The submittal shall be in a Technical Memorandum format and shall occur shortly after the results of the second quarter ground water sampling data is available.
9. The Ecological Assessment and Human Health Risk Assessment shall be submitted together in a separate volume of the RI Report. These Assessments must be submitted at least two months prior to the rest of the RI Report.
10. The schedule for the Feasibility Study shall include the dates for the Public Notice and Fact Sheet. This should occur approximately six months prior to the submittal of the FS Report.

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11. The Schedule shall also include the submittal of the Remedial Action Plans (RAP). This submittal will include the Proposed Plans, Public Health and Environmental Evaluation Plan, and a new schedule for implementing the RAP.
12. The Schedule must include submittals of draft documents, State review, submittals of final draft documents, and State review and approval.
13. Draft Primary Documents shall be submitted to the State on the following dates:
 - o draft RI Report - July 1, 1995
 - o draft FS Report - October 1, 1995
 - o draft RAP - February 1, 1996

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

Sincerely,



Thomas P. Lanphar
Associate Hazardous Materials
Specialist
Site Mitigation Branch

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