

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

(510) 540-2122



January 7, 1994

Mr. Marcelo G. Pascua, Jr.
Code
Naval Facilities Engineering Command
Western Division
900 Commodore Drive
San Bruno, California 94066-2402

Dear Mr. Pascua:

**INTERIM REMOVAL ACTION AT INTERMEDIATE MAINTENANCE FACILITY SITE,
NAVAL AIR STATION (NAS), ALAMEDA, CA**

Thank you for your letter on the results of confirmation sampling and on the Navy's recommendations for future action for the Interim Removal Action at the IMF Site. This letter responds to the recommendations for future action presented by the Navy.

The Department of Toxic Substances Control does not agree with the Navy's proposal of no additional interim removal action excavation. The removal action has not met the parameters set in the Implementation Work Plan (IWP), dated September 20, 1993 or the Final Engineering Evaluation/Cost Assessment (EE/CA), dated September 29, 1993. Further, the removal action has not sufficiently removed the threat to groundwater caused by lead contamination and acidic soil.

The EE/CA, Section 2.4, INTERIM REMEDIAL ACTION OBJECTIVES states, "the Navy, DTSC, and RWQCB have agreed to remediate soils with lead concentrations above approximately 100 mg/kg total lead in the vicinity of HLA boring B-7." Section 2.2.3 of the IWP states, "The excavation will be conducted...until all soils with lead concentrations exceeding 100 milligrams per kilogram (mg/kg) have been removed or until the maximum allowable extent of the excavation has been attained (45 feet by 50 feet by 50 feet)." Samples 137-S13-001 and 137-S13-005 have lead contaminations of 214 ppm and 218 ppm respectively.

The DTSC expects the Navy to complete the Interim Removal Action as originally designed. Several more removal actions are planned at NAS Alameda. The Navy must demonstrate to the DTSC and to the community the ability to successfully carry out interim actions according to approved work plans.

The removal action must also be completed to protect groundwater and remove soil that is contaminated above the

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hazardous waste levels as defined by State and Federal law. The pH for sample 137-S13-001 is 1.6. This pH meets the characteristic of corrosivity as defined in the California Code of Regulations, Title 22, Section 66261.22(a)(3). The TCLP analysis conducted on sample 137-S13-005 (5.940 mg/L) exceeds the regulatory level of 5.0 mg/L (CFR 40 Section 261.24).

If you have any questions regarding this letter, please call me at (510) 540-3809.

Sincerely,



Thomas P. Lanphar
Project Manager
Base Closure Branch

cc: Mr. James Nusrala
Regional Water Quality Control Board
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