

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2

10 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737

(510) 540-3724

October 12, 1995

Commander  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
Attn: Camille Garibaldi  
900 Commodore Drive  
San Bruno, California 94066-2402

Dear Ms. Garibaldi:

**REMOVAL ACTION AT SITE 18, STATION SEWER SYSTEM AT NAVAL AIR STATION, ALAMEDA**

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) and San Francisco Bay Regional Water Quality Control Board (RWQCB) have reviewed the Time Critical Removal Action Scoping Document for Site 18, the Naval Air Station's storm sewer system. You have indicated that the first phase of the removal action at Site 18 is to be implemented immediately in order to protect the environment of the San Francisco Bay. The first phase of the removal action, cleaning out of storm drain catch basins, must be completed prior to this winter's rainy season. This action is an emergency. Cleaning the catch basins immediately will help protect the San Francisco Bay in two ways. First, the catch basins are known to contain significant levels of chemical contamination. Removing the sediment will eliminate that threat. Secondly, cleaned catch basins will again be effective in collecting sediment that is washed into the sewers. Currently, the catch basins are full and can not provide that function. For technical reasons, the second phase of the action, pressure washing the sewer lines, must wait until the rains have ceased. A workplan will be developed for the second phase. The DTSC and RWQCB offer the enclosed comments on the Scoping Document for implementing the removal action.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas P. Lanphar".

Thomas P. Lanphar  
Project Manager  
Base Closure Branch

Enclosure

RECEIVED

OCT 17 1995

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cc. Mr. James Nusrala  
Regional Water Quality Control Board  
2101 Webster Street, Suite 500  
Oakland, California 94612

Lt. Mike Petouhoff  
Base Environmental Coordinator  
Alameda Naval Air Station  
Building 1, Code 52  
Alameda, California 94501

Mr. James Ricks  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105

Kent M. Rosenblum  
Early Action Focus Group Chair  
2900 Main St.  
Alameda, California 94501

To: Camille Garibaldi  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, California 94066-2402

Date: October 6, 1995

From: Tom Lanphar  
Department of Toxic Substances Control  
Office of Military Facilities  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710

**Subject: Scoping Document for Removal Action at Site 18**

1. Page 3, Removal Action Design Description

If a temporary storage facility is necessary for solids and debris, more information on this facility is needed. We would prefer to see the solids and debris be removed for the NAS Alameda for proper disposal immediately after dewatering. More information is needed on the dewatering process including: the location of the dewatering facility, the process for dewatering, and containment and storage of liquids.

2. Page 4, potential Applicable or Relevant and Appropriate Requirements (ARAR)

The ARAR section should be more specific on identifying ARARs and how these ARARs will be met.

3. Page 4, To Be Considered Guidance

The California Health and Safety Code is an ARAR and should not be classified as To Be Considered. The third bullet of this item refers to California EPA PRGs. California has not established PRGs. The Navy may be referring to the Department of Toxic Substances Control Preliminary Endangerment Assessment Guidance, January 1994.

4. Page 6, Process Common to All Alternatives, second bullet

More information is necessary on the installation of the plugs. Please explain the relationship between the jet wash and the plugs. Are large amounts of water and debris expected to pile up in front of the plugs? Is the high pressure jetting towards the plug or away from the plug?

5. Page 8, Recommendation

The DTSC does not fully agree with the chosen alternative (Alternative 1). The DTSC recommends Alternative 2. The solids should only be stored for a short period. Placement of solids in roll-off boxes will simplify the removal action. As soon as the

roll-off boxes are ready they can be taken away for proper disposal. Further, the solids will be more easily contained and covered in roll-off boxes.

6. Page 8, Removal Action Reports

The Implementation Workplan is not the only Removal Action Report necessary. An Action Memorandum and/or Removal Action Report is required after the Removal Action is completed.

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD****SAN FRANCISCO BAY REGION**2101 WEBSTER STREET, SUITE 500  
BERKELEY, CA 94612

Phone: (510) 286-1255

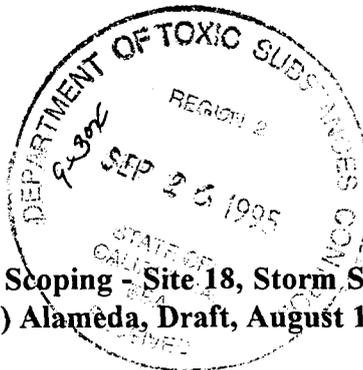
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Mr. Tom Lanphar  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710

September 25, 1995  
File No. 2199.9285 (JN)



**Subject: Time Critical Removal Action Scoping - Site 18, Storm Sewer System Solids and Debris Removal, Naval Air Station (NAS) Alameda, Draft, August 15, 1995**

Dear Mr. Lanphar:

Regional Water Quality Control Board (RWQCB) staff have reviewed the above scoping document. Comments from this review are listed below:

1. RWQCB staff have the understanding that the Navy will be cleaning out the catch basins in the storm system at NAS Alameda before November 1, 1995. This will comply with an earlier letter from the California Environmental Protection Agency, dated June 15 which requested that the Navy remove the sediments from the storm drain system at NAS Alameda. The Navy needs to describe briefly how they will implement this removal and storage or disposal of contaminated material in an updated submittal of this time-critical removal action workplan. The agencies need to see a proposed plan in writing before the Navy begins to clean out the catch basins.

2. On page 4, please include the San Francisco Bay RWQCB Basin Plan Shallow Water Effluent Limits (SWELs) (Table IV-1A, September 1992) and National Oceanic and Atmospheric Association Effects-Range Low (ERL) and Effects-Range Median (ERM) Sediment Chemistry Values (Incidence of Adverse Biological Effects Within Ranges of Chemical Concentrations in Marine and Estuarine Sediments, Environmental Management Vol. 19, No. 1, pp. 81-97 as Potential Applicable or Relevant and Appropriate Requirements. To be protective of ecological receptors at NAS Alameda, stormwater values should be referenced to the SWELs and stormwater sediment values should be referenced to ERLs and ERMs.

3. In the screening of alternatives in this document the Navy needs to give a best estimate of the amount of residual water that will be generated and the associated cost for disposal for each remedial alternative considered.

4. On page 8, General Concerns, the Navy shall consider using any excess water generated from the washing of storm lines for dust control at NAS Alameda. If the Navy wants to use any water for dust control they must first submit the analytical chemistry data to the RWQCB for approval.

If you have any questions on the comments on this time-critical removal action scoping document please contact either Vincent Christian at (510) 286-4222, or myself at (510) 286-0301.

Thank you,

*J. Nusrala*  
James Nusrala  
Project Manager