

5090
Ser 1831/L7066
12 Feb 1997

Mr. Daniel E. Murphy
Chief, Closing Bases Unit
Office of Military Facilities
California Environmental Protection Agency
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Subj: TIME CRITICAL REMOVAL ACTION AT INSTALLATION RESTORATION
SITE 18, NAVAL AIR STATION, ALAMEDA, CALIFORNIA

Dear Mr. Murphy:

We are in receipt of your letter dated November 13, 1996, which requests that we review the Navy's activities with respect to hazardous waste statutory and regulatory compliance in the ongoing Comprehensive, Environmental, Response, Compensation, and Liability Act (CERCLA) removal action at Installation Restoration (IR) Site 18 at Naval Air Station, Alameda, California.

The decision to take this action and the implementation process is documented in the Time-Critical Removal Action Scoping Report dated August 24, 1995, and the Action Memorandum, Time Critical Removal Action, Site 18 Storm Sewer System dated December 12, 1995. Each of these documents describes the intent to remove solids and debris from the catch basins, pipes, and manholes including video inspection of the lines, treatment of water generated, and disposal of the dewatered solids. The action memorandum describes the phases for implementation. Based upon the multiple meetings and the correspondence received concerning this response action, the BRAC Cleanup Team (BCT) and the Regional Water Quality Control Board agreed with the approach being implemented back in 1995. Further details of the processes being utilized are provided in the work plan dated July 1, 1996.

The material being generated during the cleaning of the lines is considered, and being treated as, hazardous waste in compliance with the substantive requirements of all applicable statutes and regulations. Regulations for treatment and recycling systems were considered Applicable, Relevant, and Appropriate Requirements for the action and the operation was designed to meet the substantive requirements. Since this is a CERCLA action, conducted entirely on-site, no procedural or administrative aspects of a permit are required.

On November 25, 1996, an inspection was completed by Mr. Christopher Lief of the Department of Toxic Substances Control, Surveillance and Enforcement Branch. Three minor violations were noted, such as labeling and closure of the separation units, and county notification of the recycling operation. The labeling and closure items have been corrected and, as a courtesy but not a requirement, notification to the county has occurred.

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We hope that this clarifies any concerns that you have concerning this removal action. Please feel free to contact Camille Garibaldi at (415) 244-2516 if you need to discuss further details.

Sincerely,

Original signed by:

HENRY C. GEE
BRAC Environmental Program Manager
By direction of
the Commanding Officer

Copies to:

Mr. Tom Lanphar
Dept. of Toxic Substances Control
Region 2
700 Heinz Ave., Building F, Suite 200
Berkeley, CA 94710

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

Mr. Ron Gervason
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

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