

5090
Ser 1831.1/L7115
4 Mar 1997

Mr. Tom Lanphar
Project Manager
State of California Environmental Protection Agency
Site Mitigation Branch
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Subj: IDENTIFICATION OF STATE "APPLICABLE OR RELEVANT AND APPROPRIATE
APPROPRIATE REQUIREMENTS" (ARARs) FOR THE REMEDIAL INVESTIGATION
AND FEASIBILITY STUDY (RI/FS) FOR OPERABLE UNITS ONE, TWO, THREE, AND
FOUR AT NAVAL AIR STATION ALAMEDA, CA.

Dear Mr. Lanphar:

In your November 13, 1996, letter you proposed a "workshop" including RAB participation to determine Applicable or Relevant and Appropriate Requirements (ARARs) for the remedial efforts at NAS Alameda. We have given your suggestion extensive consideration. We believe that a preferred approach will be to follow the process outlined in the National Oil and Hazardous Substances Pollution Contingency Plan (better known as the National Contingency Plan or "NCP") found at 40 CFR Part 300. Such an approach also furthers your department's position as the "one voice" for the State of California in ARARs identification. This approach is the same that we have been satisfactorily following at all of our other installations.

The NCP at 40 CFR Section 300.400(g) tasks the Navy as the lead agency, and the support agencies, to identify ARARs. The requirement is further expanded in Section 300.515 (d), (d)(1) and (h)(2). In accordance with your own state guidance, your department acts as a central clearing house for state-proposed ARARs to ensure protectiveness and avoid duplication. The NCP contains no references to outside public participation in the ARARs identification nor do we believe state guidance suggests such an approach.

Perhaps, if you believe a workshop still needs to be convened, DTSC would like to host such a meeting inviting other support agencies and participants as you deem necessary. Then, as part of the state's "one voice" approach, you can supplement your previous submission to us, adding or deleting proposed ARARs and generally refining the first submission. For our part, we will work with the first submission which is your attachment listing ARARs sent with your November 13th correspondence.

Thank you for your assistance in this important endeavor. Please direct any technical questions you may have concerning this request to me, at (415) 244-2516.

Sincerely,

Original signed by:

CAMILLE GARIBALDI
Lead Remedial Project Manager, NAS Alameda
By direction of
the Commanding Officer

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BRAC Environmental Coordinator (Steve Edde)

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