



Cal/EPA

September 16, 1997

Department of
Toxic Substances
Control

700 Heinz Avenue
Suite 200
Berkeley, CA
94710-2737

Commander
Engineering Field Activity, West
Naval Facilities Engineering Command
Att.: Ken Spielman
900 Commodore Drive
San Bruno, California 94066-2402

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

Dear Mr. Spielman:

**TREATABILITY STUDY MEETING, SEPTEMBER 8, 1997, FORMER
NAVAL AIR STATION, ALAMEDA**

The purpose of this letter is to highlight issues raised by the Department of Toxic Substances Control (DTSC) at the meeting on September 8, 1997. The meeting was held to discuss treatability studies proposed by the Navy and Tetra-Tech, EM-Inc. for implementation at the former Naval Air Station, Alameda. DTSC is supportive of the Navy in their efforts to conduct treatability studies at NAS Alameda. Further, DTSC agrees that the treatability studies proposed are useful and appropriate studies for NAS, Alameda. DTSC hopes that by identifying and resolving issues early, treatability studies at NAS Alameda will be implemented successfully.

At the meeting DTSC stated that because the Navy will not establish the treatability study through a CERCLA or California Health and Safety Plan, Chapter 6.8 decision document there are two general issues of concern. These are: 1) ensuring that all necessary hazardous waste treatment permits are identified and obtained prior to implementing the treatability study; and 2) ensuring that the treatability studies scope remains limited and does not constitute a remedial action. Specific questions and issues raised by DTSC on the proposed treatability studies follow.



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Phytoremediation

More information was requested on the fate of contaminants taken up from the groundwater and into the roots of the poplar trees. Is any of the contaminant transpired into the atmosphere? What is the affect of salt water on poplar trees?

Emulsion Recycling

Because contaminated soil will be taken off-site for study, DTSC expressed concern that the project be limited in scope and that only the amount of soil necessary to complete the study be removed from the site. DTSC is also concerned that the Navy determine if the contaminated soil is a hazardous waste. If the soil is a hazardous waste, the soil may not be appropriate for the treatability study.

Surfactant Enhanced Groundwater Recovery

Treatment of extracted groundwater is a part of this treatability study. Groundwater may be a hazardous waste. If so, the Navy will need to identify and address permit requirements for treating contaminated groundwater.

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: See next page.

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cc. Ms. Lynn Suer
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Mr. Steve Edde
Base Environmental Coordinator
Alameda Point
950 West Mall Square
Alameda, California 94501

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