

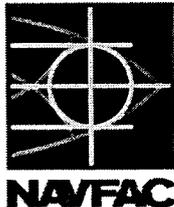
AECRU Contract Number N68711-00-D-0005  
Delivery Order DO033

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

CURRENT STATUS OF REGULATED RCRA  
UNITS HAZARDOUS WASTE FACILITY PERMIT  
CA 2170023236  
NAVAL AIR STATION, ALAMEDA, CALIFORNIA  
(NOW KNOWN AS ALAMEDA POINT)  
ALAMEDA, CALIFORNIA

June 2, 2004

Prepared for

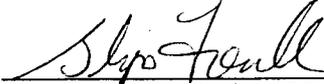


DEPARTMENT OF THE NAVY  
Lou Ocampo, Remedial Project Manager  
Southwest Division  
Naval Facilities Engineering Command  
San Diego, California

Prepared by



TETRA TECH EM INC.  
1230 Columbia Street, Suite 1000  
San Diego, California 92101  
(619) 525-7188

  
Glynis Foulk, Project Manager

TC.A033.10226

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Navy Letter dated May 26, 2004

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Current Status of Regulated RCRA Units at Alameda Point  
June 2004

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DEPARTMENT OF THE NAVY  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132-5190

5090  
Serial 06CA.LO/0568  
May 26, 2004

Mr. Mohinder Sandhu  
Chief  
Standardized Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
California Environmental Protection Agency  
8800 Cal Center Drive  
Sacramento, CA 95826

Dear Mr. Sandhu:

Subj: REQUEST CONFIRMATION ON THE STATUS OF ALL REGULATED UNITS UNDER  
HAZARDOUS WASTE FACILITY PERMIT EPA ID NUMBER CA 2170023236, NAVAL  
AIR STATION ALAMEDA, CALIFORNIA

This is a request to the California Department of Toxic Substances Control (Department) for acknowledgement of the current status of the Resource Conservation and Recovery Act (RCRA) regulated units at the former Naval Air Station Alameda, California currently also known as Alameda Point. The goal is to avoid any last minute discovery of closure issues particularly during the parcel transfer process. We have been coordinating this matter with your Department's project manager, Mr. Dean Wright and also have been working with him on the ongoing corrective actions for the other units.

We are forwarding you the enclosed binder for your handy reference. The binder includes a summary table on the status of all the units, a figure showing their locations at Alameda Point, and copies of documents issued to the Navy from the Department regarding closures and status of individual units. As you may see in the summary table, the following units have been closed: five (5) Part Bs, three (3) interim status documents units, two (2) conditionally authorized, and eight (8) conditionally exempted units. The highlighted units are currently undergoing closures under the oversight of your Branch.

We would appreciate your response to this request preferably within thirty (30) days after receipt of this letter. Should you have any questions, please call Mr. Lou Ocampo, Navy Remedial Project Manager at (619) 532-0969 or me at (619) 532-0907.

Sincerely,

A handwritten signature in black ink, appearing to read "T. L. Macchiarella".

THOMAS L. MACCHIARELLA  
BRAC Environmental Coordinator  
By direction of the Commander

Enclosure: (1) Status of Regulated Facilities, Permit ID# 2170023236, NAS Alameda

5090  
Serial 06CA.LO/0568  
May 26, 2004

Copy to:  
Mr. Dean Wright, R.G.  
Standardized Permits and Corrective Action  
Branch  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, CA 95826

Ms. Elizabeth Johnson  
950 W. Mall Sq., Bldg 1  
Alameda Point  
Alameda, CA 94501-7552

Mr. Sal Ciriello, Section Chief  
Standardized Permits and Corrective Action  
Branch  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2737

Mr. Lou Ocampo, w/ 2 copies  
Navy BRAC Operations Office  
NAVFAC, EFDSW  
1230 Columbia Street  
San Diego, CA 92101

Mr. Dan Murphy  
Office of Military Facilities and Mitigation Branch  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2737

Ms. Diane Silva, w/ 3 copies – RCRA  
Regulated Units  
Navy Admin Records  
NAVFAC, EFDSW  
1220 Pacific Highway  
San Diego, CA 92132

Ms. Anna-Marie Cook  
US Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

Mr. Doug Delong  
Navy Caretaker Office  
410 Palm Ave, Building 1, Ste 161  
San Francisco, CA 94030-1806

Ms. Marcia Liao  
Office of Military Facilities and Mitigation Branch  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2737

## **INTRODUCTION**

---

Tetra Tech EM Inc., on behalf of the U.S. Department of the Navy (Navy), Naval Facilities Engineering Command, Southwest Division, has prepared this reference binder regarding the closure of the hazardous waste units under the RCRA hazardous waste facility permit (CA2170023236) for Naval Air Station Alameda, now known as Alameda Point, Alameda, California.

This binder is prepared to support the Navy request to the Department of Toxic Substances Control for confirmation on the Current Status of the Regulated RCRA Units.

Table 1 summarizes the current status of the regulated units and Figure 1 shows the location of the regulated units at Alameda Point. The binder is divided in three sections:

- Section 1: Part B Regulated RCRA Units
- Section 2: Interim Status Document (ISD) Regulated RCRA Units
- Section 3: Tiered Permit Regulated RCRA Units

**TABLE 1: SUMMARY TABLE; CURRENT STATUS OF REGULATED RCRA UNITS**

Alameda Point, Alameda, California

Page 1 of 1

STATION & LOCATION	PERMIT NUMBER	EXPIRATION DATE	REGULATED UNIT	STATUS	REMARKS
NAS Station Alameda, CA aka Alameda Point	CA2170023236 (Part B)	24-Jul-03	IWTP 24	closed	DTSC approval of Jan 21, 1998
			Bldg 13	closed	DTSC approval of May 4, 2000
			Structure 598	closed	DTSC approval of Sep 26, 1995
			IWTP 5	closed	DTSC approval of Oct 12, 1999
			Yard D-13	closed	DTSC approval of Jul 21, 1999
			IWTP 25	Not closed	DTSC closure plan approval ltr of Oct 20, 2003. Closure in progress
			IWTP 32	Not closed	DTSC closure plan approval ltr of Dec 22, 2003. Closure in progress
	CA2170023236 (ISD)	8-Nov-92 (CCR 66270.73) or administrative disposition	IWTP 410	closed	DTSC approval of Nov 9, 1998
			M-10 Annex Area 37	closed	DTSC approval of Oct 10, 2000
			M-12 SE Corner Bldg. 5	closed	DTSC approval of July 27, 2001
			IWTP 360	Not closed	DTSC closure plan approval ltr of Feb 20, 2004 & Navy response ltr of Mar 5, 2004. Closure in progress
			USTs Area 37	Not closed	Navy's draft amendment to the closure plan of May 2004. USTs were removed but no DTSC closure ltr yet.
	CA2170023236 (CA)	1998	BOWTS, Pier 2 & 3	closed	DTSC ltr of Sep 26, 1997 authorizing Trident. ACHCS letter of Jan 2003 to Trident. Navy ltr of June 1997 to EBMUD with submittal of closure plan. Navy memo of Jul 28, 1997 last payment fee.  Navy notification ltr of May 11, 1998 to DTSC & ACHCSA
			TP-01, SRU, Hanger 41	closed	
	TP-02, SRU, Bldg 16	closed			
	TP-03, SRU, Bldg 400	closed			
	TP-04, SRU, B-5, Photo Lab	closed			
	TP-05, SRU, B-5 Radiogr Lab	closed			
	TP-06, CR, Bldg 360	closed			
TP-07, CR, Bldg 32	closed				
TP-08, CR, Bldg 25	closed				
CA2170023236 (CA)	1997	TP-09, pH unit, Bldg 360	closed	Navy notification ltr of April 1, 1997 to DTSC	

**ABBREVIATIONS:**

ACHCSA Alameda County Health Care Services Agency  
 BOWTS Bilge oily water treatment system  
 CA Conditional authorization  
 CE Conditional Exemption  
 CRA Container rinsing area

DTSC Department of Toxic Substances Control  
 ISD Interim status document  
 IWTP Industrial waste treatment plant  
 SRU Silver recovery unit  
 TP Tiered permit



**Part B Regulated RCRA Units**

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

ACCEPTANCE OF CLOSURE CERTIFICATION  
REPORT FOR BUILDING 24  
INDUSTRIAL WASTEWATER TREATMENT PLANT

DATED 21 JANUARY 1998



**EPA**

Department of  
Toxic Substances  
Control

70 Heins Avenue,  
Oakland, CA 94612  
415 779 3100

January 21, 1998

Mr. Randy Cate  
Navy Transition Office, Alameda point  
950 Mall Square West  
Alameda, CA 94501-5000

Pete Wilson  
Governor

Peter M. Rooney  
Secretary for  
Environmental  
Protection

**ACCEPTANCE OF CLOSURE CERTIFICATION REPORT FOR  
BUILDING 24 INDUSTRIAL WASTEWATER TREATMENT PLANT  
(IWTP), NAVAL AIR STATION ALAMEDA, ALAMEDA CA EPA ID No.  
CA2 170 023 236**

Dear Mr. Cate:

The Department of Toxic Substances Control has reviewed the submitted "Closure Summary Report, Building 24, Industrial Waste Treatment Plant, Naval Air Station Alameda, Alameda, California". The report certified that Building 24 Industrial Wastewater Treatment Plant (IWTP) has been closed in accordance with the approved closure plan which is part of the permit issued on July 24, 1993. Furthermore, the closure complied with the requirements in California Code of Regulations, Title 22, Chapter 14, Article 7. DTSC understands that confirmation soil sampling does not show detectable concentrations of volatile and semi-volatile organic compounds in the soil or groundwater. Metals in the soil are well within background levels and groundwater samples show no contamination from Building 24 IWTP. This letter is to acknowledge that DTSC approves the report and considers the unit officially closed.

DTSC's approval of this closure is not a certification that Naval Air Station Alameda does not pose any environmental or public health threat, nor does it remove any liabilities associated with past hazardous waste management practices which occurred at the Building 24 IWTP.

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

ACCEPTANCE OF CLOSURE CERTIFICATION  
REPORT FOR BUILDING 13  
FLAMMABLE WASTE STORAGE AREA

DATED 03 FEBRUARY 2000

AND

ACCEPTANCE OF CLOSURE CERTIFICATION  
REPORTS AND ACTIVITIES FOR ALL REGULATED  
UNITS IN BUILDING 13

DATED 04 MAY 2000



## Department of Toxic Substances Control

Edwin F. Lowry, Director  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Gray Davis  
Governor

**COPY**

February 3, 2000.

Ms. Sue Neishi  
Environmental Compliance Manager  
Navy Transition Office, Alameda Point  
950 Mall Square West, Suite 200  
Alameda, California 94501

**ACCEPTANCE OF CLOSURE CERTIFICATION REPORT FOR BUILDING 13,  
FLAMMABLE WASTE STORAGE AREA, NAVAL AIR STATION ALAMEDA.  
EPA ID No.: CA 2170023236**

Dear Ms. Neishi:

The Department of Toxic Substances Control (DTSC) has reviewed the closure certification report titled "Closure Certification Report for RCRA Permitted Facility Building 13", dated August 31, 1999, for the former flammable waste storage area located at Naval Air Station (NAS) Alameda. The Closure Certification Report was signed by an independent registered professional engineer and an authorized representative of Naval Air Station Alameda, certifying that Building 13 has been closed in accordance with the approved closure plan.

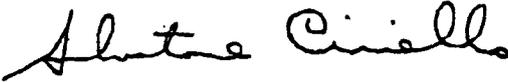
The Closure Certification Report (Report) shows that clean-up criteria of clean closure was achieved. The Report certifies that sampling data were below either naturally occurring background levels for soil or residential preliminary remediation goals for soils at the former Flammable Waste Storage Area in NAS Alameda Building. Therefore, DTSC concurs that approved closure plan objectives have been achieved. DTSC hereby accepts the "Closure Certification Report for RCRA Permitted Facility Building 13".

Ms. Sue Neishi  
Feb. 3, 2000  
Page 2

This acknowledgment of facility closure is not a certification that the facility does not pose any environmental or public health threat, not does it remove any liabilities associated with past hazardous waste management practices which occurred on the site.

If you have any questions, please contact Glenn Brown at (510) 540-3961.

Sincerely,



for  
Mohinder S. Sandhu, P.E., Chief  
Standardized Permits and Corrective Action Branch

cc: Randy Cate  
Environmental Compliance Manager  
Navy Transition Office, Alameda Point  
950 Mall Square West, Suite 200  
Alameda, California 94501

Mary Rose Cassa  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

## Department of Toxic Substances Control

Edwin F. Lowry, Director  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721



Gray Davis  
Governor

May 4, 2000

Randy Cate  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, California 94066-5006

**ACCEPTANCE OF CLOSURE CERTIFICATION REPORTS AND ACTIVITIES FOR  
ALL REGULATED UNITS IN BUILDING 13, NAVAL AIR STATION ALAMEDA.  
EPA ID No.: CA 2170023236**

Dear Mr. Cate:

The Department of Toxic Substances Control (DTSC) has made the determination, based upon the conclusions of our October 23, 1998 correspondence to Mr. Roger Caswell and the activities associated with NAS Alameda's "Closure Certification Report for RCRA Permitted Facility Building 13", dated August 31, 1999, that all regulated units in Building 13 have been closed in accordance with the approved closure plan.

The Closure Certification Report (Report) shows that clean-up criteria of clean closure was achieved. The Report certifies that sampling data were below either naturally occurring background levels for soil or residential preliminary remediation goals for soils at the former Flammable Waste Storage Area in NAS Alameda Building. Therefore, DTSC concurs that approved closure plan objectives have been achieved. DTSC hereby accepts the "Closure Certification Report for RCRA Permitted Facility Building 13".

Mr. Randy Cate

May 4, 2000

Page 2

This acknowledgment of facility closure is not a certification that the facility does not pose any environmental or public health threat, nor does it remove any liabilities associated with past hazardous waste management practices which occurred on the site.

If you have any questions, please contact Glenn Brown at (510) 540-3961.

Sincerely,



Salvatore Ciriello,  
Supervising Hazardous Substances Engineer  
Standardized Permits and Corrective Action Branch

cc: Mary Rose Cassa  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

PERMIT MODIFICATION FOR INDUSTRIAL  
TREATMENT PLANTS 5, 24, 25, 32, AND  
STRUCTURE 598

DATED 26 SEPTEMBER 1995

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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

September 26, 1995

Lt. Commander M.L. Petouhoff  
Naval Air Station, Alameda (Code 0152)  
Alameda, CA 94501-5000

Dear Lt. Commander Petouhoff:

**PERMIT MODIFICATIONS FOR INDUSTRIAL TREATMENT PLANTS (IWTPs) 5,  
24, 25, 32 and STRUCTURE 598**

The Department of Toxic Substances Control (DTSC) has received your request to modify your hazardous waste permit for the IWTPs 5, 24, 25, 32 and Structure 598. DTSC understands that Alameda Naval Air Station (ANAS) proposes the following modifications:

- 1) Allow IWTP 5 to accept ANAS generated wastewaters with California waste code 121.
- 2) Allow IWTP 24 to accept ANAS generated wastewaters with California waste codes 121 and 561.
- 3) Allow IWTP 25 to accept ANAS generated wastewaters with California waste code 561.
- 4) Allow IWTP 32 to accept ANAS generated wastewaters with California waste codes 121 and 561.
- 5) Allow the appropriate IWTP to treat wastewaters generated from on-site decontamination and/or on-site remediation of contaminated areas.
- 6) Delete Structure 598 in Area 37 from ANAS's hazardous waste permit. All three tanks in Structure 598 were never used to store hazardous waste. After deletion, the tanks will be used to store fuel products.

From the above statements, DTSC has determined that your modification request qualifies as a Class One modification as defined in CCR Title 22, Section 66270.42 and CCR Title 22, Appendix I. Your proposed modification requires no prior approval from DTSC. DTSC considers your letter dated August 25, 1995 as the notice of modification as required in CCR Title 22, Section 66270.42(a)1.A and you may perform the modification at your convenience. Be advised that ANAS still needs to comply with the other provisions in CCR Title 22, Section 66270.42.



Lt. Commander Petouhoff  
Page two  
September 26, 1995

Please keep me informed on the commencement of any of the above modifications, particularly when you issue the public notice. If you have any further questions, please call me at (510)540-3955.

Sincerely,



Bernie Edrada  
Hazardous Substances Engineer  
Facility Permitting Branch

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

ACCEPTANCE OF CLOSURE CERTIFICATION  
REPORT FOR BUILDING 5  
INDUSTRIAL WASTE TREATMENT PLANT  
FORMER PERMITTED HAZARDOUS WASTE  
TREATMENT FACILITY

DATED 12 OCTOBER 1999



## Department of Toxic Substances Control



Vinston H. Hickox  
Secretary for  
Environmental  
Protection

Edwin F. Lowry, Director  
700 Heinz Avenue, Bldg. F, Suite 200  
Berkeley, California 94710-2721

Gray Davis  
Governor

October 12, 1999

COPY

Ms. Sue Neishi  
Environmental Compliance Manager  
Navy Transition Office, Alameda Point  
950 Mall Square West, Suite 200  
Alameda, California 94501

**Acceptance of Closure Certification Report for Building 5 Industrial Waste Treatment Plant (IWTP), Former Permitted Hazardous Waste Treatment Facility, Naval Air Station Alameda. EPA ID No.: CA 2170023236**

Dear Ms Neishi:

The Department of Toxic Substances Control (DTSC) has reviewed the closure certification report titled "Closure Summary Report, Building 5 Industrial Waste Treatment Plant", dated October 27, 1997, for the former treatment facility located at Naval Air Station Alameda. The Closure Summary Report was signed by an independent registered professional engineer and an authorized representative of Naval Air Station Alameda, certifying that the Building 5 IWTP unit has been closed in accordance with the approved closure plan. The Closure Summary Report shows that clean-up standards of Residential Preliminary Remediation Goals (PRGs) were met. DTSC now considers the hazardous waste management unit of the former Building 5 IWTP to be officially closed.

This acknowledgment of facility closure is not a certification that the facility does not pose any environmental or public health threat, not does it remove any liabilities associated with past hazardous waste management practices which occurred on the site.

If you have any questions, please contact Glenn Brown at (510) 540-3961.

Sincerely,

For Mohinder S. Sandhu, P.E., Chief  
Standardized Permits and Corrective  
Action Branch

Ms. Sue Neishi  
Page Two  
Oct. 12, 1999

cc: Randy Cate ✓  
Environmental Compliance Manager  
Navy Transition Office, Alameda Point  
950 Mall Square West, Suite 200  
Alameda, California 94501

Mary Rose Cassa  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

ACCEPTANCE OF CLOSURE CERTIFICATION  
REPORT FOR YARD D-13, FORMER INTERIM  
STATUS HAZARDOUS WASTE STORAGE  
FACILITY

DATED 21 JULY 1999



## Department of Toxic Substances Control

Edwin F. Lowry, Director  
700 Heinz Avenue, Bldg. F, Suite 200  
Berkeley, California 94710-2721



Gray Davis  
Governor

aston H. Hickox  
etary for  
vironmental  
ection

July 21, 1999

Ms. Sue Neishi  
Environmental Compliance Manager  
Navy Transition Office  
950 W. Mall Square, Suite 200  
Alameda, CA 94501

**ACCEPTANCE OF CLOSURE CERTIFICATION REPORT FOR YARD D-13,  
FORMER INTERIM STATUS HAZARDOUS WASTE STORAGE FACILITY, NAVAL  
AIR STATION, ALAMEDA, CALIFORNIA, EPA ID No. CA 2170023236**

Dear Ms. Neishi:

The Department of Toxic Substances Control has reviewed the closure certification report titled "Closure Certification Report for RCRA Permitted Facility, Yard D-13" dated March 4, 1998. Based on this report, DTSC understands the following:

- 1) The report certified that Yard D-13 has been closed in accordance with the approved Clarified Closure Plan for Yard D-13 Hazardous Waste Storage Facilities dated January 30, 1997.
- 2) The review comments on the subject closure certification report were sent to you on June 16, 1999. In the statistical determination of the upper confidence interval limits, we requested an additional trial of lognormal distribution for possible better fitting of analytical data. Upon further review, we have concluded that the upper confidence limits of analytical data for each chemical of concern are below the corresponding residential Preliminary Remedial Goal limits (PRGs) and that the closure has met the closure performance standards.
- 3) The closure was complied with the requirements in California Code of Regulations, Title 22, Chapter 15, Article 7 (closure of ISD facilities).

This letter is to acknowledge that DTSC has reviewed this report and accepts this closure certification and considers Yard D-13 being officially closed.

Ms. Neishi  
July 21, 1999  
Page 2

DTSC's approval of this closure is not a certification that Navy does not pose any environmental or public health threat, nor does it remove any liabilities associated with past hazardous waste management practices which occurred at Yard D-13. This approval also does not release this former storage facility from any investigations that may be required by DTSC's Site Mitigation Branch.

If you have any questions, please contact Stanley Sun at (510) 540-3955.

Sincerely,



For Mohinder S. Sandhu, P.E., Chief  
Standardized Permit and Corrective Action

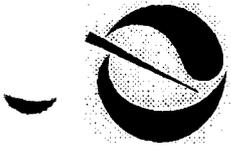
CC: Mr. John McCarroll, Chief  
RCRA Permits Section  
U.S. EPA  
75 Hawthorne St.  
San Francisco, CA 94150

(K.navyd13\cert.wpd)

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

APPROVAL OF THE AMENDMENT TO THE  
CLOSURE PLAN FOR THE  
INDUSTRIAL WASTE TREATMENT PLANT 25

DATED 20 OCTOBER 2003



## Department of Toxic Substances Control



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721

Gray Davis  
Governor

October 20, 2003

Mr. Luciano A. Ocampo, P.E.  
Remedial Project Manager  
Department of the Navy  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

**APPROVAL OF THE AMENDMENT TO THE CLOSURE PLAN FOR THE  
INDUSTRIAL WASTE TREATMENT PLANT (IWTP) 25 , NAVAL AIR  
STATION, ALAMEDA (ALAMEDA POINT), ALAMEDA, CALIFORNIA,  
EPA ID # CA 2 170 023 236**

Dear Mr. Ocampo:

The Department of Toxic Substances Control (DTSC) has received and reviewed the Final Amendment to the Closure Plan (Closure Plan) dated October 9, 2003 for the permitted hazardous waste management units at the Industrial Waste Treatment Plant (IWTP) 25. DTSC hereby approves the Closure Plan. DTSC is still reviewing the Field Work Plan dated September 30, 2003. The Closure Plan describes an overview of the closure process and the Field Work Plan describes specific sample locations at IWTP 25, analytical parameters, test methods, quality control etc. The U.S. Navy shall not begin the field work until DTSC approves the Field Work Plan.

If you have any questions or comments concerning this letter please contact Mr. Dean Wright of my staff at (916) 255-6528.

Sincerely,

for: 

Wei Wei Chui, Section Chief  
Standardized Permitting and Corrective Action Branch

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.  
For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

Mr. Luciano A. Ocampo  
October 20, 2003  
Page 2

cc: Ms. Beth Kelly  
Project Manager  
Tetra Tech EM Inc.  
10670 White Rock Road, Suite 100  
Rancho Cordova, California 95670

Norman Shopay, R.G.  
Geology, Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710

Dean Wright  
Standardized Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, California 95826

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

APPROVAL OF THE REVISED CLOSURE  
DOCUMENTS FOR INDUSTRIAL WASTE  
TREATMENT PLANT 25 AND 32

DATED 22 DECEMBER 2003



Terry Tamminen  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

Edwin F. Lowry, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



Arnold Schwarzenegger  
Governor

December 22, 2003

Mr. Luciano A. Ocampo, P.E.  
Remedial Project Manager  
Department of the Navy  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

**APPROVAL OF THE REVISED CLOSURE DOCUMENTS FOR INDUSTRIAL WASTE TREATMENT PLANT (IWTP) 25 AND 32, ALAMEDA NAVAL AIR STATION (ALAMEDA POINT), ALAMEDA, CALIFORNIA, EPA ID # CA 2170023236**

Dear Mr. Ocampo:

The Department of Toxic Substances Control (DTSC) has reviewed and approved the following documents:

1. Amendment to the Closure Plan for IWTP 32, December 8, 2003, prepared by Tetra Tech Inc.
2. Final Work Plan for Amendment to Closures at IWTPs 25 and 32, dated December 17, 2003, prepared by Shaw Environmental, Inc.

Amendment to the Closure Plan for IWTP 25 dated October 2003, prepared by Tetra Tech Inc. was previously approved by DTSC on October 20, 2003.

The Amendment to the Closure Plan outlines the tasks necessary to achieve closure for each unit. The Final Work Plan for IWTP 25 and 32 provides the sampling techniques, locations, and analysis necessary to conduct the field work for both units. The Revised Closure Plans, consisting of Amendments to the Closure plans and the Final Workplan for IWTP 25 and 32 are now considered complete and approved. The Navy shall begin the closure field activities at these units. Please provide DTSC one week notice prior to mobilizing for the field efforts. The closure report and certification shall be submitted to DTSC by March of 2005.

Mr. Luciano A. Ocampo

December 22, 2003

Page 2

If you have any questions or comments concerning this letter please contact Mr. Dean Wright of my staff at (916) 255-6528.

Sincerely,



Wei Wei Chui, Section Chief  
Standardized Permitting and Corrective Action Branch

cc:

Ms. Beth Kelly  
Project Manager  
Tetra Tech EM Inc.  
10670 White Rock Road, Suite 100  
Rancho Cordova, California 95670

Norman Shopay, R.G.  
Geology, Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710

Dean Wright  
Standardized Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, California 95826

Dan Shafer  
Project Manager  
Shaw Environmental, Inc  
1326 North Market Blvd.  
Sacramento, California 95834

**Interim Status Document (ISD) Regulated RCRA Units**

Current Status of Regulated RCRA Units at Alameda Point  
June 2004

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

ACCEPTANCE OF CLOSURE CERTIFICATION  
REPORT FOR BUILDING 410  
INDUSTRIAL WASTEWATER TREATMENT PLANT

DATED 09 NOVEMBER 1998



Cal/EPA

November 9, 1998

Department of  
Toxic Substances  
Control

Pete Wilson  
Governor

700 Heinz Avenue,  
Bldg. F, Suite 200  
Berkeley, CA  
94710

Mr. Roger Caswell  
Navy Transition Office, Alameda point  
950 Mall Square West  
Alameda, CA 94501-5000

Peter M. Rooney  
Secretary for  
Environmental  
Protection

**ACCEPTANCE OF CLOSURE CERTIFICATION REPORT FOR  
BUILDING 410 INDUSTRIAL WASTEWATER TREATMENT PLANT  
(IWTP), NAVAL AIR STATION ALAMEDA, ALAMEDA CA EPA ID No.  
CA2 170 023 236**

Dear Mr. Caswell:

The Department of Toxic Substances Control has reviewed the closure certification report titled "Draft Additional Environmental Sampling Investigation, Building 410, Industrial Waste Treatment Plant, Naval Air Station Alameda, Alameda, California" dated March 1998. Based on this report and the "Closure Summary Report, Building 410, Industrial Waste Treatment Plant" dated February 1997, DTSC understands the following:

- 1) The report certified that Building 410 Industrial Wastewater Treatment Plant (IWTP) has been closed in accordance with the approved closure plan.
- 2) The closure complied with the requirements in California Code of Regulations, Title 22, Chapter 15, Article 7 (closure of ISD facilities).
- 3) Confirmation soil samples show metals, volatile organic compounds and semi-volatile organic compounds are all below residential preliminary remediation goals (PRGs).

This letter is to acknowledge that DTSC has reviewed this report and accepts this closure certification and considers Building 410 IWTP officially closed. However, since there are remaining units under the Alameda Naval Air Station Hazardous Waste Facility Permit that have not been certified closed, the terms and conditions of that permit remain in effect.

OPTIONAL FORM 95 (7-90)

**X TRANSMITTAL**

# of pages **2**

<i>Glynis Foulk</i>	From <i>Sue Neish</i>
1./Agency	Phone #
	Fax #

Mr. Caswell  
November 9, 1998  
Page 3

DTSC's approval of this closure is not a certification that Naval Air Station Alameda does not pose any environmental or public health threat, nor does it remove any liabilities associated with past hazardous waste management practices which occurred at the Building 410 IWTP. This approval also does not release Building 410 IWTP from any investigations that may be required by DTSC's Site Mitigation Branch-Office of Military Facilities.

If you have any questions, please contact Bernie Edrada at (510) 540-3955.

Sincerely,



Mohinder S. Sandhu, P.E., Chief  
Standardized Permits and Corrective Action

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

CLOSURE CERTIFICATION ACCEPTANCE FOR  
AREA 37 ANNEX HAZARDOUS WASTE STORAGE  
FACILITY

DATED 10 OCTOBER 2000



## Department of Toxic Substances Control



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721

Gray Davis  
Governor

October 10, 2000

COPY

Mr. Steve Edde  
Base Realignment and Closure  
Environmental Liaison  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

**Closure Certification Acceptance for Area 37 Annex Hazardous Waste Storage Facility, at the Former U. S. Naval Air Station Alameda, Alameda Point, California. EPA ID No.: CA2 170 023 236**

Dear Mr. Edde:

The Department of Toxic Substances Control (DTSC) has received the Facility Closure Certification Report (Report), dated September 11, 2000 for the Annex Area 37 Hazardous Waste Storage Facility located at the former Naval Air Station (NAS) Alameda, at Alameda Point, California. The Report was signed by an independent registered professional engineer and an authorized representative of the facility, certifying that the subject facility has been closed in accordance with the approved closure plan. The Report shows that the clean-up standards of Residential Preliminary Remediation Goals (PRGs) were met. DTSC accepts the Closure Certification Report and now considers the hazardous waste management facility of Annex Area 37 Hazardous Waste Storage Facility located at the former NAS Alameda to be officially closed.

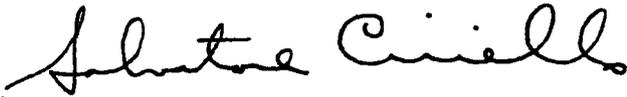
Accordingly, since this completes the work being conducted under Fee-For-Service Contract Number 97-T1494 (Site Code/WP = 520030/50), DTSC will initiate closeout of this contract.

This acknowledgment of facility closure is not a certification that the facility does not pose any environmental or public health threat, nor does it remove any liabilities associated with past hazardous waste management practices which occurred on the site.

Mr. Steve Edde  
October 10, 2000  
Page Two

If you have any questions, please contact Glenn Brown at (510) 540-3961.

Sincerely,



For Mohinder S. Sandhu, Chief  
Standardized Permits and Corrective Action Branch

cc: Gary Baker  
Accounting Section  
Department of Toxic Substances Control  
400 P Street  
Sacramento, California 95812

Mary Rose Cassa  
Office of Military Facilities  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

APPROVAL OF CLOSURE CERTIFICATION  
REPORT FOR THE HAZARDOUS WASTE  
STORAGE UNIT OF THE HAZARDOUS WASTE  
STORAGE FACILITY LOCATED NEAR THE  
SOUTHEASTERN CORNER OF BUILDING 5

DATED 27 JULY 2001

AUG-15-2001 2:17PM

NO. 4002 P. 2/3



## Department of Toxic Substances Control



Edwin F. Lowry, Director  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721

Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Gray Davis  
Governor

OPTIONAL FORM 99 (7-90)

### FAX TRANSMITTAL

# of pages ▶ 2

To	BETH KELLY	From	STEVE EDEE
Dept./Agency	TEEMI	Phone #	(510) 749-5952
Fax #	(916) 852-0307	Fax #	(510) 749-5978
NSN 7540-01-317-7368		5099-101 GENERAL SERVICES ADMINISTRATION	

July 27, 2001

Mr. Steve Edee  
Base Environmental Liaison  
Alameda Point  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

**APPROVAL OF CLOSURE CERTIFICATION REPORT FOR THE HAZARDOUS WASTE STORAGE UNIT OF THE HAZARDOUS WASTE STORAGE FACILITY LOCATED NEAR THE SOUTHEASTERN CORNER OF BUILDING 5, U.S. NAVY, NAVAL AIR STATION, ALAMEDA. EPA ID No.: CA 2170023236**

Dear Mr Edee:

The Department of Toxic Substances Control (DTSC) has reviewed the closure certification report titled "Certification Report for Closure, Facility Closure Report, Southeastern Corner of Building 5" (Report), dated March 2, 2001, for the former hazardous waste storage unit of the Hazardous Material Storage Facility (HMSF) located near the southeastern corner of Building 5 of Naval Air Station, Alameda (Alameda Point). The Report was signed by an independent registered professional engineer and an authorized representative of Naval Air Station, Alameda (U.S. Department of the Navy) certifying that HMSF's hazardous waste storage unit was closed in accordance with the approved closure plan. The Report demonstrates that clean-up standards of residential Preliminary Remediation Goals (PRGs) were met. DTSC now considers this hazardous waste management unit to be officially closed.

This acknowledgment of facility closure is not a certification that the facility does not pose any environmental or public health threat, nor does it remove any liabilities associated with past hazardous waste management practices which occurred on the site.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dte.ca.gov](http://www.dte.ca.gov).

Mr. Steve Edde  
July 27, 2001  
Page 2

If you have any questions, please contact Mr. Glenn Brown at (510) 540-3961.

Sincerely,

  
Mohinder S. Sandhu, P.E., Chief  
Standardized Permits and Corrective  
Action Branch

APPROVAL OF THE AMENDMENT TO THE  
INDUSTRIAL WASTE TREATMENT PLAN 360  
CLOSURE PLAN (PART I AND II)

DATED 20 FEBRUARY 2004

AND

APPROVAL OF THE AMENDMENT TO THE  
INDUSTRIAL WASTE TREATMENT PLANT 360  
CLOSURE PLAN (PART I AND II)

DATED 05 MARCH 2004



Terry Tamminen  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

Edwin F. Lowry, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



Arnold Schwarzenegger  
Governor

February 20, 2004

Commander, Naval Facilities Engineering Command  
Southwest Division  
Attn: Mr. Luciano A. Ocampo, P.E.  
Remedial Project Manager  
1220 Pacific Highway  
San Diego, California 92132-5190

TO: AIR  
RCA IWTP  
360  
ALAMEDA  
2/25/04

**APPROVAL OF THE AMENDMENT TO THE INDUSTRIAL WASTE TREATMENT PLANT (IWTP) 360 CLOSURE PLAN (PART I AND II), ALAMEDA NAVAL AIR STATION (ALAMEDA POINT), ALAMEDA, CALIFORNIA, EPA ID # CA 2170023236**

Dear Mr. Ocampo:

The Department of Toxic Substances Control (DTSC) has reviewed the final Part I Amendment to the Closure Plan and Part II Sampling and Analysis Plan for IWTP 360, dated January 16, 2004, prepared by Tetra Tech Inc. The Amendment to the Closure Plan outlines the tasks necessary to achieve closure for the unit and the Sampling and Analysis Plan provides the sampling techniques, locations, and analysis necessary to conduct the field work. Part I and Part II of the Amendment to the Closure Plan are approved, however, the Navy must address the comments from DTSC's Human and Ecological Risk Division (HERD) listed below either during the field work or the closure report preparation as appropriate:

1. Please provide an estimate of the total incremental cancer risk and non-cancer hazard under, a residential scenario, for the material remaining at the site in soil and groundwater for consideration by the risk managers. Element-by-element or compound-by-compound elimination of constituents (Part I, Section 5.1.1, page 10) is insufficient information for the risk managers.
2. EPA and/or Department of Health Services (DHS) Maximum Contaminant Levels (MCLs) were used as screening values for groundwater (Part I, Section 6.0, page 13) in the Human Health Risk Assessment (HHRA). These are inadequate for determining risk and/or hazard as they are not risk based and do not include other exposure pathways such as inhalation of indoor air and other exposures to groundwater contaminants. Potential effects on ecological receptors are also not addressed in the event groundwater travels to surface water.

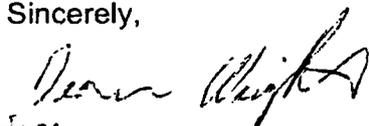
Mr. Luciano A. Ocampo  
February 20, 2004  
Page 2

3. EPA Region 9 soil PRGs for residential use were checked and found to be accurate, with several exceptions. The U.S. EPA lists an MCL of  $1.1E+02$   $\mu\text{g/l}$  for hexavalent chromium in water. OEHHA also has a hexavalent chromium value for water consumption. The table (Section 8.0, page 17) lists 'NA', taken to mean Not Applicable. Please correct the table referenced to include the most current values.
4. The former IWTP treated plating wastewater with sulfuric acid, sulfur dioxide, sodium hydroxide, sodium hypochlorite and a polymer to precipitate the metals (Part I, Section 10.1.1, page 10-2). Given the nature of the fill material used to construct NAS Alameda it would not be unreasonable for these chemicals to leach toxic materials from the fill material if there were a leak in the piping. If results of the initial sampling suggest the piping has leaked, DTSC recommends that a full suite of inorganic elements be assessed in any further sampling.
5. The Project-Required Reporting Limits (PRRLs) (Part II, Table D-1, page D-1) were checked and found to be appropriate for evaluation in the HHRA, even for the withdrawn California-modified soil cadmium PRG of 1.7 mg/kg rather than the residential soil PRG of 37 mg/kg listed. However, total incremental cancer risk and/or hazard must be presented.

The Navy shall begin the closure field activities at this unit as scheduled. DTSC acknowledges the notice of February 18, 2004 indicating that field work is set to begin on March 3, 2004. Please submit the closure report and certification to DTSC by July 30, 2004.

If you have any questions or comments concerning this letter please contact Mr. Dean Wright of my staff at (916) 255-6528.

Sincerely,



for:  
Wei Wei Chui, Section Chief  
Standardized Permitting and Corrective Action Branch

cc: Next page

Mr. Luciano A. Ocampo

February 20, 2004

Page 3

cc: Ms. Beth Kelly  
Project Manager  
Tetra Tech EM Inc.  
10670 White Rock Road, Suite 100  
Rancho Cordova, California 95670

Dan Shafer  
Project Manager  
Shaw Environmental, Inc  
1326 North Market Blvd.  
Sacramento, California 95834

Peter Russell  
Northgate Environmental Management, Inc.  
950 Northgate Drive, Suite 313  
San Rafael, California 94903

Dot Lofstrom, R.G.  
Geology, Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, California 95826

Jim Polisini, PhD  
Toxicology Support Group  
Department of Toxic Substances Control  
1011 North Grandview Avenue  
Glendale, California 91201

Dean Wright, R.G.  
Standardized Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, California 95826



DEPARTMENT OF THE NAVY  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132 - 5190

5090  
Ser 06CA.LO/0266  
March 5, 2004

Ms. Wei Wei Chui  
Section Chief  
Standardized Permits and Corrective Action Branch  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2721

Dear Ms. Chui:

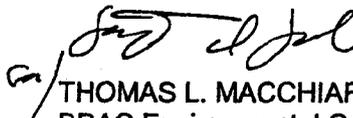
Subj: APPROVAL OF THE AMENDMENT TO THE INDUSTRIAL WASTE TREATMENT  
PLANT (IWTP) 360 CLOSURE PLAN (PART I AND II) ALAMEDA NAVAL AIR STATION  
(ALAMEDA POINT), ALAMEDA, CALIFORNIA EPA ID # 2170023236

Thank you for your letter of February 20, 2004 forwarding the Department of Toxic  
Substances Control (DTSC) approval of the Final Amendment to the Closure Plan (Part I) and  
Sampling and Analysis Plan (Part II) of IWTP 360 dated January 16, 2004, and the DTSC  
review comments from its Human and Ecological Risk Division (HERD) on the same document.

Enclosure (1) is Navy's response and resolutions to the review comments. We will  
implement these resolutions during the fieldwork and as requested in your letter, we will also  
address them in the Closure Report. Our schedule is to submit draft closure report to DTSC by  
July 2004 and the certification report by May 2005; however, we do our best to submit earlier  
than the schedule.

Should you have any questions, please contact Mr. Ocampo at (619) 532-0969 or me at  
(619) 532-0907.

Sincerely,

  
THOMAS L. MACCHIARELLA  
BRAC Environmental Coordinator  
By direction of the Commander

Encl: (1) Navy Response to DTSC comments per letter of Wei Wei Chui of February 20, 2004

5090  
Ser 06CA.LO/0266  
March 5, 2004

Copy to:

Mr. Dean Wright, R.G.  
Standardized Permits and Corrective Action Branch  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, CA 95826

Ms. Beth Kelly/Glynis Foulk  
Tetra Tech EM, Inc.  
10670 White Rock Road, Suite 100  
Rancho Cordova,

Ms. Dot Lofstrom, R.G.  
Geology, Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, CA 95826

Mr. Dan Shafer  
Shaw Environmental, Inc.  
1326 North Market Blvd.  
Sacramento, CA 95834

Ms. Marcia Liao  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710

Mr. Doug Delong,  
Navy CSO  
410 Palm Avenue, Bdg 1, Suite 161  
San Francisco, CA 94030-1806

Mr. Jim Polisini, PhD  
DTSC Toxicology Support Unit  
1011 N. Grandview Avenue  
Glendale, CA 91201

Ms. Anna-Marie Cook  
US EPA  
75 Hawthorne Street  
San Francisco, CA 94105

Ms. Debbie Potter  
City of Alameda  
950 West Mall Square, Room 217  
Alameda, CA 94501

Mr. Peter Russell  
Northgate Environmental Management, Inc.  
950 Northgate Drive, Suite 313  
San Rafael, CA 94903

**NAVY RESPONSE TO COMMENTS DATED FEBRUARY 20, 2004 FROM THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC) ON THE REVIEW OF FINAL AMENDMENT TO THE CLOSURE PLAN AND SAMPLING AND ANALYSIS PLAN, INDUSTRIAL WASTE TREATMENT PLANT 360, ALAMEDA POINT (Formerly Naval air Station Alameda) ALAMEDA, CALIFORNIA.**

---

DTSC comments are from Ms. Wei Wei Chui based on comments from James Polisini with HERD.

**Comment 1: Please provide an estimate of the total incremental cancer risk and non-cancer hazard under, a residential scenario, for the material remaining at the site in soil and groundwater for consideration by the risk managers. Element-by-element or compound-by-compound elimination of constituents (Part I, Section 5.1.1, page 10) is insufficient information for the risk managers.**

**Response:** The human health risk assessment (HHRA) will be conducted after the sampling proposed in the amendment to the closure plan is completed; the results from the current round of sampling will be included in the HHRA. Total incremental cancer risk and non-cancer hazard will be calculated in the HHRA.

**Comment 2: EPA and/or Department of Health Services (DHS) Maximum Contaminant Levels (MCLs) were used as screening values for groundwater (Part I, Section 6.0, page 13) in the Human Health Risk Assessment (HHRA). These are inadequate for determining risk and/or hazard as they are not risk based and do not include other exposure pathways such as inhalation of indoor air and other exposures to groundwater contaminants. Potential effects on ecological receptors are also not addressed in the event groundwater travels to surface water.**

**Response:** The HHRA has not yet been conducted; the HHRA will be conducted after the sampling proposed in the amendment to the closure plan is completed – and this evaluation would consider all significant exposure pathways and all likely exposure scenarios. Furthermore, site information will be evaluated to make a determination of any potential ecological risks that could be attributed to contaminants associated with this site – and then, if necessary, the appropriate level of ecological risk assessment will be conducted.

**Comment 3: EPA Region 9 soil PRGs for residential use were checked and found to be accurate, with several exceptions. The U.S. EPA lists an MCL of 1.1E+02 µg/l for hexavalent chromium in water. OEHHA also has a hexavalent chromium value for water consumption. The table (Section 8.0, page 17) lists 'NA', taken to mean Not Applicable. Please correct the table referenced to include the most current values.**

**Navy Response to DTSC comments of Feb 20, 2003**

**Response:** The U.S. EPA lists a preliminary remediation goal (PRG) of 1.10E+02 µg/l for tap water. This value will be included in the IWTP 360 investigation report. The OEHHA public health goal (PHG) for drinking water for chromium was withdrawn in November 2001 and has not been replaced; OEHHA does not currently have a PHG for hexavalent chromium. No change will be made to the Final Part I Amendment to the Closure Plan and Part II Sampling and Analysis Plan for IWTP 360 documents.

**Comment 4:** The former IWTP treated plating wastewater with sulfuric acid, sulfur dioxide, sodium hydroxide, sodium hypochlorite and a polymer to precipitate the metals (Part I, Section 10.1.1, page 10-2). Given the nature of the fill material used to construct NAS Alameda it would not be unreasonable for these chemicals to leach toxic materials from the fill material if there were a leak in the piping. If results of the initial sampling suggest the piping has leaked, DTSC recommends that a full suite of inorganic elements be assessed in any further sampling.

**Response:** The Navy will analyze the soil and groundwater samples collected under this sampling plan for the full suite of inorganic elements. This change will be reflected in the closure or investigation report as requested by DTSC.

**Comment 5:** The Project-Required Reporting Limits (PRRLs) (Part II, Table D-1, page D-1) were checked and found to be appropriate for evaluation in the HHRA, even for the withdrawn California-modified soil cadmium PRG of 1.7 mg/kg rather than the residential soil PRG of 37 mg/kg listed. However, total incremental cancer risk and/or hazard must be presented.

**Response:** Refer to the response to comment 1.

**Comment at end of letter:** The Navy shall begin the closure field activities at this unit as scheduled. DTSC acknowledges the notice of February 18, 2004 indicating that fieldwork is set to begin on March 3, 2004. Please submit the closure report and certification to DTSC by July 30, 2004.

**Response:** The Navy will submit the Draft IWTP 360 Investigation Report discussing the results of the soil and groundwater sampling and the conclusions of the HHRA and ecological risk assessment to DTSC by July 30, 2004. In accordance with the project schedule in the final amendment to the closure plan, the draft closure certification report will not be available until May 2005. Navy will try to submit the report earlier if possible.

**USTs Area 37**

Draft Amendment to Closure Plan for USTs Area 37  
was submitted to DTSC May 2004  
This document is not included in this reference binder

**Tiered Permit Regulated RCRA Units**

**Conditional Authorization (BOWTS and TP-09)  
Notification of Termination in Accordance with  
Health & Safety Code 25200.3(g)(2)**

**Conditional Exemption (TP-01 through TP-08)  
Notification of Termination in Accordance with  
Health & Safety Code 25201.5(d)(8)(B)**

## Kelly, Beth

---

**From:** Marcia Liao [mliao@dtsc.ca.gov]  
**Sent:** Thursday, May 23, 2002 1:28 PM  
**To:** Kelly, Beth  
**Cc:** Glenn Brown  
**Subject:** Conditionally Exempt units

Beth: FYI. Mickey says that for closure of a Conditionally Exempt Unit, you will need to close and decontaminate the unit, and notify the Alameda County DEH (567-6862). You only have to certify that you closed the unit, decontaminated it and handled all residuals and residue properly. No requirement for PE cert or inspection (although the CUPA may want to check it out). Rules are in 25201.5(d)(8)(A)/(B).

Marcia

### **Bilge Oily Wastewater Treatment System (BOWTS)**

- 1) DTSC. Authorization Letter to Trident Management Inc for operation of BOWTS. September 26, 1997.
- 2) Alameda County Health Care Services. Letter to Trident Management Inc. Regarding Removal from Permit by Rule Program. January 9, 2004
- 3) Navy. Letter to EBMUD with Submittal of Closure Plan for BOWTS. June 20, 1997.
- 4) Navy. Memorandum Regarding Payment of Final Wastewater Charge to EBMUD for BOWTS. July 28, 1997.



Cal/EPA

Department of  
Toxic Substances  
Control

400 P Street,  
4th Floor  
P.O. Box 806  
Sacramento, CA  
95812-0806

September 26, 1997



Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

TRIDENT MANAGEMENT INC  
MICHAEL ELSEY  
1605 FERRY POINT  
ALAMEDA, CA 94501

EPA ID: CAL000138901  
Initial Authorization: 09/26/97

For facility located at:  
1605 FERRY POINT  
ALAMEDA, CA 94501

Dear Onsite Treatment Facility:

Your Initial Notification (Form DTSC 1772) for the treatment unit(s) listed on the last page of this letter has been received. It is administratively complete, but has not been reviewed for technical adequacy. A technical review will be conducted when an inspection is performed. At any time you may be inspected and will be subject to penalty if violations of laws or regulations are found.

These units are hereby authorized pursuant to California law. YOUR AUTHORIZATION TO OPERATE CONTINUES UNTIL YOU NOTIFY DTSC THAT YOU HAVE STOPPED TREATING WASTE AND HAVE FULLY CLOSED THE UNIT(S).

The Onsite Treatment Program will be undergoing a number of changes in 1997. The state Senate established the Certified Unified Program Agency (CUPA) to consolidate six programs, including onsite treaters, at the local agency. Some important changes to the onsite treatment program are:

- o CUPAs will be immediately responsible for inspections and enforcement, complaint response, closure oversight and industry assistance.
- o DTSC will handle all notification processing and most corrective action oversight, at least through 1997, and Financial Assurance reviews until further notice.
- o If your CUPA was certified and effective on or before January 1, 1997 you do not pay Tiered Permitting fees to the state, but will be subject to local fees and may be billed by your CUPA. If your CUPA was certified after January 1, 1997 you may be subject to state fees and billed by BOE.



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TRIDENT MANAGEMENT INC  
Page 2

EPA ID: CAL000138901

For information about the CUPA in your jurisdiction, you may contact the appropriate DTSC regional office (see enclosed map) or your County Environmental Health Department. However, you will be notified by your CUPA when it is certified.

If your facility is operating pursuant to a PERMIT-BY-RULE or a grant of CONDITIONAL AUTHORIZATION, your facility is responsible for complying with corrective action requirements established by Health and Safety Code Section 25200.14.

If you have any questions please contact your nearest DTSC Regional Office.

Sincerely,



Sangat Kals, Ph.D., Chief  
Unified Program Section  
State Regulatory Program Division

cc:  
LARRY WONG  
DTSC REGION 2  
SURVEILLANCE & ENFORCEMENT BR.  
700 HEINZ AVE., BLDG.F, 2ND FL.  
BERKELEY, CA 94710

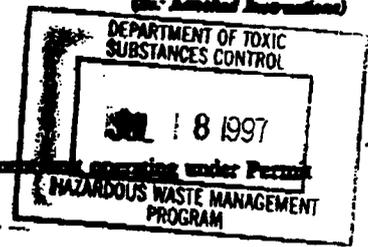
MR ARIU LEVI  
ALAMEDA COUNTY  
ALAMEDA COUNTY ENV HEALTH  
1131 HARBOR BAY PKWY #240  
ALAMEDA, CA 94502

Units authorized to operate at this location:  
UNDER PERMIT BY RULE: #1

# CERTIFICATION OF FINANCIAL ASSURANCE FOR PERMIT BY RULE AND CONDITIONALLY AUTHORIZED OPERATIONS

FOR OFFICIAL USE ONLY  
EHS REGIONAL OFFICE

1PBR  
RZ



For use by owner or operator of transportable treatment unit, owner or operator of fixed treatment unit operating under Permit by Rule, or a generator operating pursuant to a grant of Conditional Authorization.

- Initial Certification
- Amended Certification *Put an asterisk in the left margin next to the amended information.*
- Annual Certification

## I. GENERAL INFORMATION

### A. TYPE OF OPERATION:

- PBR-FTU
- PBR-TTU
- CA
- OTHER \_\_\_\_\_

If operation is a TTU, insert TTU serial number: \_\_\_\_\_

B. FACILITY/TTU EPA ID NO: CAE000138901

C. FACILITY/TTU NAME: BILGE ONLY WATER TREATMENT SYSTEM

### D. ADDRESS OR LEGAL DESCRIPTION OF FACILITY/TTU LOCATION:

WHARF 2 1605 FERRY POINT

CITY: ALAMEDA CA CA ZIP CODE: 94501

COUNTY: ALAMEDA

### E. MAILING ADDRESS:

HOME BLD TRIDENT MANAGEMENT, INC  
1605 FERRY POINT

CITY: ALAMEDA STATE: CA ZIP CODE: 94501

### F. CONTACT PERSON:

ELSEY LAST NAME MICHAEL F ELSEY FIRST NAME

TELEPHONE NUMBER (510) 864 2749

FACILITY/STU NAME TRID IT MANAGEMENT SYSTEM  
BILCO WATER CITY TREATMENT EPA ID NUMBER CAL 000138901

G. FACILITY OWNER OR OPERATOR INFORMATION:

Is the signer of this certification the:  Owner or  Operator?

NAME: MICHAEL CROUCH

ADDRESS: 336 MT SIERRA PLACE

CITY: CLAYTON STATE: CA ZIP CODE: 94517

TELEPHONE NUMBER: (909) 672 0921

II. FINANCIAL ASSURANCE FOR CLOSURE:

A. ESTIMATED CLOSURE COSTS: \$ \_\_\_\_\_ (Please see instructions before entering any dollar amount)

B. TYPE OF CLOSURE ASSURANCE MECHANISM: \_\_\_\_\_

C. MECHANISM IDENTIFICATION NUMBER(S): # \_\_\_\_\_  
(if applicable)

D. FINANCIAL INSTITUTION, INSURANCE OR SURETY COMPANY, OR OTHER ORGANIZATION:

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP CODE: \_\_\_\_\_

E. EFFECTIVE DATE OF CLOSURE ASSURANCE MECHANISM: \_\_\_\_\_

F. ORIGINAL DOCUMENT(S) ATTACHED:

Attach the original document(s) used to satisfy the closure financial assurance requirements.

Attach the detailed closure cost estimate that resulted in the cost shown in item A (see attached model.)

**FACILITY/TTU NAME TRIDE - M&T INC**

**ED NUMBER CAL 000138**

**BIQUE OILY WATER TREATMENT SYSTEM**

**III. FINANCIAL ASSURANCE SELF CERTIFICATION OR EXEMPTION:**

This section is for an owner or operator of TTU, owner or operator of FTU, or a generator operating pursuant to a grant of Conditional Authorization who is eligible or ineligible for an exemption from financial assurance requirements pursuant to Title 22, CCR section 67430.13(c). If you are not certain as to whether you qualify for an exemption from financial assurance, please see instruction for this section.

Please check the appropriate box:

- 1. As a TTU owner or operator or FTU owner or operator, I have not operated more than thirty days in a calendar year.

Note: If box (1) is marked, your treatment unit(s) must be operating under PRR to be eligible for the 30 day exemption. Generators operating under Conditional Authorization are not eligible for this exemption. Be sure to sign the owner or operator certification below.

- 2. I am required to provide a mechanism and it is attached to this form.

Note: If box (2) is marked, you must complete all section of this form (DTSC #113 (1/96)). Be sure to sign the owner or operator certification below.

- 3. I am not required to provide a mechanism. Specify why: \_\_\_\_\_

**IV. OWNER OR OPERATOR CERTIFICATION:**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

MICHAEL S CROUCH  
NAME (PRINT OR TYPE)

PRESIDENT TRIDENT MANAGEMENT  
TITLE - INC.

x *Michael S Crouch*  
SIGNATURE

7/14/97  
DATE SIGNED

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

January 9, 2004

Mr. Michael Crouch  
Trident Management Inc.  
1605 Ferry Point  
Alameda, CA 94501

RE: Removal from the Permit By Rule Program

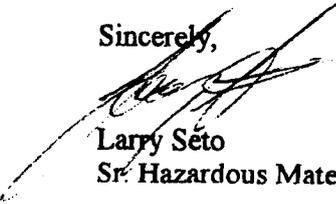
Dear Mr. Crouch:

I have removed your facility from the Permit by Rule program after reviewing the laboratory analysis of three bilge water samples collected on May 15, 2003, May 28, 2003 and June 3, 2003. The samples collected from three different vessels were determined to be non-hazardous.

If in the future your facility treats a hazardous waste, this office must be contacted and an application for a permit must be submitted.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

  
Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Files



DEPARTMENT OF THE NAVY  
ENGINEERING FIELD ACTIVITY, WEST  
NAVAL FACILITIES ENGINEERING COMMAND  
900 COMMODORE DRIVE  
SAN BRUNO, CALIFORNIA 94066-2402

IN REPLY REFER TO:

5090  
Ser 616/007  
June 20, 1997

East Bay Municipal Utility District  
Source Control Division  
Ms. Karen Biber  
P.O. Box 24055  
Oakland, California 94623-1055

Dear Ms. Biber:

The Alameda Point Navy Transition Office (NTO), previously called the Alameda Point Caretaker Site Office, is submitting a closure plan for the Bilge Oily Wastewater Treatment System as enclosure (1).

The NTO point of contact is Randy Cate, at (510) 749-8995.

Sincerely,

A handwritten signature in cursive script, reading "B. P. Appell", is written above the typed name.

B. P. APPELL  
By direction of  
The Officer In Charge

Encl.  
(1) BOWTS Closure Plan

## BOWTS Closure Plan

1. Date of proposed work or production stoppage: April 25, 1997.
2. Date of proposed final closure (after cleaning and demobilizing activities are complete): July 3, 1997.
3. All chemical and container consolidation activities and raw material and waste inventory:

a. Treatment Chemical Inventory:

ECA 1350	202 gallons in 500 gallon storage tank
NaOH	105 gallons in 500 gallon storage tank
2PA	245 gallons in 500 gallon storage tank

b. Waste Inventory:

Waste Oil	2,500 - 3,000 gallons
Sludge	500 gallons
Filter Press	Some filter cake residue present (less than 5 gallons in volume)
Oil/Water Separator	Approximately 3,995 gallons of oily water and 5 gallons of oil
Piping	Approximately 50 gallons of oily water

4. Description of cleaning activities involving hazardous materials:

The process equipment, tanks and piping will be emptied of wastes and rinsed. This includes the oil/water separator, the slop oil tanks which have been used, the sludge tank, the weirs in the induced air floatation tank, the sludge filter press and process piping.

5. Description of methods of disposing of all inventoried items:

a. The wastes (waste oil, sludge cake and oily water) will be shipped offsite for disposal as hazardous waste.

b. The treatment chemicals ECA 1350, NaOH, and 2PA, which are stored in 500 gallon storage tanks, will be left in place for the new permit applicant, Trident Management, Inc.

MEMORANDUM

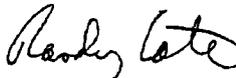
July 28, 1997

From: Randy Cate, Navy Transition Office, Alameda Point  
To: Jim Wilcoxon, NAS Alameda Controller

Subj: PAYMENT OF PERMIT FEES FOR BILGE OILY  
WASTEWATER TREATMENT SYSTEM TO EBMUD

Ref: (a) EBMUD Invoice for Account No. 50305891 for the  
period of 6 May 97 through 3 July 97

1. Request issuance of a check for the amount of \$3,227.54 to the East Bay Municipal Utility District (EBMUD) for wastewater charges for the Bilge Oily Wastewater Treatment Plant (BOWTS), as requested in reference (a). A copy of reference (a) is provided for your information.
2. The BOWTS has been closed and this will be the final wastewater charge to be paid to EBMUD for this permit.
3. The NTO Alameda Point point of contact is Randy Cate, at (510) 749-8995.

  
Randy Cate

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

LETTER TO DTSC REQUESTING TERMINATION  
OF OPERATION FOR EIGHT CONDITIONALLY  
EXEMPT TIERED PERMITS

DATED 11 MAY 1998



DEPARTMENT OF THE NAVY  
ENGINEERING FIELD ACTIVITY, WEST  
NAVAL FACILITIES ENGINEERING COMMAND  
900 COMMODORE DRIVE  
SAN BRUNO, CALIFORNIA 94066-2402

[REDACTED]

IN REPLY REFER TO:  
5090  
Ser 616CA/074  
May 11, 1998

Mickey Pierce  
California Department of Toxic Substances Control  
Facility Permitting Branch, Tiered Permits, Region 2  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2737

Dear Mr. Pierce:

The Navy Transition Office (NTO) Alameda Point is requesting termination of the Conditionally Exempt Specified Wastestreams Tiered Permit for five silver recovery units and three container rinsing areas. The Conditionally Exempt Specified Wastestreams were permitted for Naval Air Station, Alameda, under EPA identification number CA2170023236. A list of these permitted units is provided below:

<u>Unit Number</u>	<u>Process Type</u>	<u>Location</u>
1	Silver Recovery	Hangar 41
2	Silver Recovery	Building 16
3	Silver Recovery	Building 400
4	Silver Recovery	Bldg. 5 Photo Lab
5	Silver Recovery	Bldg. 5 NDI Radiographic Lab
6	Container Rinsing	Building 360, Shop 96215
7	Container Rinsing	Building 32, Shop 93432
8	Container Rinsing	Building 25, Shop 97640

The five silver recovery units were used for recovery of silver from photofinishing. These units were taken out of operation as a result of base closure. The container rinsing process was never used at any of the three locations. Silver Recovery Unit No. 1 was last used prior to September 1996, and then cleaned and moved off the base for use at a new location by the Aircraft Intermediate Maintenance Department (AIMD). Silver Recovery Unit No. 2 was last used in March 1997. The unit was cleaned and disposed of as hazardous waste in June 1997. Silver Recovery Units Nos. 3, 4, and 5 were last used in April 1995. They were then flushed with water, allowed to air dry, and turned in to the precious metal recycling section of the Defense Reutilization and Marketing Office, Alameda for recycling and disposal.

Form 1772 is provided as enclosure (1) with the information to terminate the Navy permit. Copies of the original unit specific notifications for each permitted unit are provided as enclosure (2).

The NTO Alameda Point point of contact is R. Caswell at (510) 749-8913.

Sincerely,



C. S. SMITH  
Lieutenant Commander, U.S. Navy  
Officer In Charge  
Navy Transition Office, Alameda Point

Enclosure:

- (1) Form 1772 Onsite Hazardous Waste Treatment Notification Form
- (2) Copies of Unit Specific Notifications

Copy to:  
Alameda County Health Care Services Agency

Form 1772

Enclosure (1)

# ONSITE HAZARDOUS WASTE TREATMENT NOTIFICATION FORM

## FACILITY SPECIFIC NOTIFICATION

For Use by Hazardous Waste Generators Performing Treatment Under Conditional Exemption and Conditional Authorization, and by Permit By Rule Facilities

Initial  
 Amend

Please refer to the attached Instructions before completing this form. You may notify for more than one permitting tier by using this notification form, DTSC 1772. You must attach a separate unit specific notification form for each unit at this location. There are different unit specific notification forms for five of the categories and an additional notification form for transportable treatment units (TTU's). You only have to submit forms for the tier(s)/category(ies) that cover your unit(s). Discard or recycle the other unused forms. Number each page of your completed notification package and indicate the total number of pages at the top of each page at the 'Page \_\_\_ of \_\_\_'. Put your EPA ID Number on each page. Please provide all of the information requested; all fields must be completed except those that state 'if different' or 'if available'. Please type the information provided on this form and any attachments.

The notification fees are assessed on the basis of the highest tier the notifier will operate under and will be collected by the State Board of Equalization. **DO NOT SEND YOUR FEE PAYMENT WITH THIS NOTIFICATION FORM.**

### I. NOTIFICATION CATEGORIES

Indicate the number of units you operate in each tier. This will also be the number of unit specific notification forms you must attach. Conditionally Exempt Small Quantity Treatment operators may not operate units under any other tier.

Number of units and attached unit specific notifications for each tier reported.

- |  |   |
|--|---|
| A. <u>    </u> Conditionally Exempt-Small Quantity Treatment (CESQT) | D. <u>    </u> Permit by Rule (PBR)               |
| B. <u>  8  </u> Conditionally Exempt-Specified Wastestream (CESW)    | E. <u>    </u> CE-Commercial Laundry (CE-CL)      |
| C. <u>    </u> Conditionally Authorized (CA)                         | F. <u>    </u> Conditionally Exempt-Limited (CEL) |

### II. GENERATOR IDENTIFICATION

EPA ID NUMBER CA 2170023236

BOE NUMBER (if available) HA HQ 36034466

FACILITY NAME Navy Transition Office, Alameda Point

(DBA-Doing Business As)

PHYSICAL LOCATION 950 W. Mall Square, Suite 200

CITY Alameda CA ZIP 94501

COUNTY Alameda

CONTACT PERSON Susan Neishi PHONE NUMBER (510) 749 - 8912  
(First Name) (Last Name)

#### MAILING ADDRESS, IF DIFFERENT:

COMPANY NAME \_\_\_\_\_

STREET \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

COUNTRY \_\_\_\_\_

(only complete if not USA)

CONTACT PERSON \_\_\_\_\_ PHONE NUMBER( ) \_\_\_\_\_  
(First Name) (Last Name)

**III. RADIOACTIVE MATERIALS OR WASTE**

NO

Does the facility use, store or treat radioactive materials or radioactive waste?

**IV. TYPE OF COMPANY: STANDARD INDUSTRIAL CLASSIFICATION (SIC) CODE:**

Use either one or two SIC codes (a four digit number) that best describe your company's products, services, or industrial activity.

Example: 7384 Photofinishing lab 7218 Industrial launderers

First: 3724 Aircraft, Engines and Engine Parts Second: \_\_\_\_\_

**V. PRIOR PERMIT STATUS: Check yes or no to each question:**

YES NO

1. Did you file a PBR Notice of Intent to Operate (DTSC Form 8462) in 1992 for this location?

2. Do you now have or have you ever held a state or federal hazardous waste facility full permit or interim status for any of these treatment units?

3. Do you now have or have you ever held a state or federal full permit or interim status for any other hazardous waste activities at this location?

4. Have you ever held a variance issued by the Department of Toxic Substances Control for the treatment you are now notifying for at this location?

5. Has this location ever been inspected by the state or any local agency as a hazardous waste generator?

**VI. PRIOR ENFORCEMENT HISTORY: Not required from conditionally exempt generators or commercial laundries.**

YES NO

Within the last three years, has this facility been the subject of any convictions, judgments, settlements, or final orders resulting from an action by any local, state, or federal environmental, hazardous waste, or public health enforcement agency?

(For the purposes of this form, a notice of violation does not constitute an order and need not be reported unless it was not corrected and became a final order.)

If you answered Yes, check this box and attach a listing of convictions, judgments, settlements, or orders and a copy of the cover sheet from each document. (See the Instructions for more information)

**VII. ATTACHMENTS: Attachments are not required from commercial laundries.**

1. A plot plan/map detailing the location(s) of the covered unit(s) in relation to the facility boundaries.

2. A unit specific notification form for each unit to be covered at this location.

**VIII. CERTIFICATIONS:** *This form must be signed by an authorized corporate officer or any other person in the company who has operational control and performs decision-making functions that govern operation of the facility (per Title 22, California Code of Regulations (CCR) Section 66270.11). All three copies must have original signatures.*

**Waste Minimization** I certify that I have a program in place to reduce the volume, quantity, and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

**Tiered Permitting Certification** I certify that the unit or units described in these documents meet the eligibility and operating requirements of state statutes and regulations for the indicated permitting tier, including generator and secondary containment requirements. I understand that if any of the units operate under Permit by Rule or Conditional Authorization, I will also provide the required financial assurance for closure of the treatment unit by October 1, 1996.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are substantial penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

C. S. SMITH, Lieutenant Commander, U.S. Navy

Name (Print or Type)

*C. S. Smith*

Signature

Officer In Charge

Title

*5/11/98*

Date Signed

**REQUESTING A SHORTENED REVIEW PERIOD:** *Generators operating under CA and/or CE are legally authorized to operate 60 days after submitting a complete notification. DTSC may shorten the time period between notification and authorization when the owner or operator establishes good cause. If you need to be authorized sooner than the standard 60-day period, please check the box below and state the reason. Your authorization will be automatically effective on the date your completed notification form is received by DTSC. (Use additional sheets, if necessary.)*

YES

Reason: \_\_\_\_\_

**OPERATING REQUIREMENTS:**

*Please note that generators treating hazardous waste onsite are required to comply with a number of operating requirements which differ depending on the tier(s). These operating requirements are set forth in the statutes and regulations, some of which are referenced in the Tier-Specific Fact Sheets available from DTSC's regional and headquarters offices.*

**SUBMISSION PROCEDURES:**

*All three forms must have original signatures, not photocopies. You must submit two copies of this completed notification by certified mail, return receipt requested, to:*

Department of Toxic Substances Control  
Program Data Management Section, HQ-10  
Attn: TP Notifications - Form 1772  
400 P Street, 4th Floor, Room 4453 (walk in only)  
P.O. Box 806  
Sacramento, CA 95812-0806

*You must also submit one copy of the notification and attachments to the local regulatory agency in your jurisdiction as listed Appendix 2 of the instruction materials. You must also retain a copy as part of your operating record.*

**PLEASE, DO NOT SEND YOUR FEE PAYMENT WITH THIS FORM.**



DEPARTMENT OF THE NAVY

NAVAL AIR STATION  
250 MAIL SQUARE  
ALAMEDA, CALIFORNIA 94601 5000

[REDACTED]

[REDACTED]

IN REPLY REFER TO:

5090  
Ser 015/116  
8 August 1994

Department of Toxic Substances Control  
Form 1772  
Onsite Hazardous Waste Treatment Unit  
400 P Street, 4th Floor (walk in only)  
P.O. Box 806  
Sacramento, CA 95812-0806

Dear Sir/Madam:

The Naval Air Station (NAS) Alameda is submitting a tiered permit application for eight conditionally exempt specified wastestreams and one conditionally authorized wastestream. The conditionally exempt specified wastestreams are for recovery of silver from photofinishing at Hangar 41 (AIMD), Building 16 Branch Medical Clinic, Building 400 Graphic Arts Shop 94421, Building 5 Photo Lab Shop 93333, Building 5 Non Destructive Inspection Radiographic Lab Shop 93434; and for triple rinsing of drums at Building 360 Shop 96215, Building 32 Shop 93432, and Building 25 Shop 97640. The conditionally authorized wastestream is for pH adjustment of aqueous waste with a pH between 2.0 and 12.5 at Building 360 Unit No. M-1304154.

Two signed copies of the tiered permit applications and United States Treasury Check No. 6133-22243638 for the amount of \$1240.00 are enclosed.

The NAS Alameda point of contact is Ms. Lucy Sapien, Code 01521, at (510) 263-3715.

Sincerely,

  
M. L. PETOUHOFF  
By direction of the  
Commanding Officer

Encl.

- (1) Tiered Permit Applications
- (2) United States Treasury Check No. 6133-22243638

Copy to:  
Mike James  
Department of Toxic Substances Control, Region 2

NAVAL AVIATION DEPT. ALAMEDA (Sub 510)



MAILING ADDRESS, IF DIFFERENT:

COMPANY NAME (DBA) Naval Air Station Alameda  
 STREET \_\_\_\_\_  
 CITY Alameda STATE CA ZIP 94501-5000  
 COUNTRY \_\_\_\_\_  
(only complete if not USA)  
 CONTACT PERSON Lucia Sapien PHONE NUMBER (510) 263-3715  
(First Name) (Last Name)

III. TYPE OF COMPANY: STANDARD INDUSTRIAL CLASSIFICATION (SIC) CODE:

Use either one or two SIC codes (a four digit number) that best describe your company's products, services, or industrial activity.

Example: 7384 Photofinishing lab 3672 Printed circuit boards  
 First: 3724 Aircraft, Engines, + Engine Parts Second: 8062 General Medical and Surgical Hospital

IV. PRIOR PERMIT STATUS: Check yes or no to each question:

- | YES                                 | NO                                  |  |
|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 1. Did you file a PBR Notice of Intent to Operate (DTSC Form 8462) in 1992 for this location?  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 2. Do you now have or have you ever held a state or federal hazardous waste facility full permit or interim status for any of these treatment units? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 3. Do you now have or have you ever held a state or federal full permit or interim status for any other hazardous waste activities at this location? |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 4. Have you ever held a variance issued by the Department of Toxic Substances Control for the treatment you are now notifying for at this location?  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 5. Has this location ever been inspected by the state or any local agency as a hazardous waste generator?  |

V. PRIOR ENFORCEMENT HISTORY: Not required from generators only notifying as conditionally exempt.

YES  NO   
 Within the last three years, has this facility been the subject of any convictions, judgments, settlements, or final orders resulting from an action by any local, state, or federal environmental, hazardous waste, or public health enforcement agency?

(For the purposes of this form, a notice of violation does not constitute an order and need not be reported unless it was not corrected and became a final order.)

If you answered Yes, check this box and attach a listing of convictions, judgments, settlements, or orders and a copy of the cover sheet from each document. (See the Instructions for more information)

## VI. ATTACHMENTS:

1. A plot plan/map detailing the location(s) of the covered unit(s) in relation to the facility boundaries.
2. A unit specific notification form for each unit to be covered at this location.

VII. CERTIFICATIONS: *This form must be signed by an authorized corporate officer or any other person in the company who has operational control and performs decision-making functions that govern operation of the facility (per title 22, California Code of Regulations (CCR) section 66270.11). All three copies must have original signatures.*

Waste Minimization I certify that I have a program in place to reduce the volume, quantity, and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Tiered Permitting Certification I certify that the unit or units described in these documents meet the eligibility and operating requirements of state statutes and regulations for the indicated permitting tier, including generator and secondary containment requirements. I understand that if any of the units operate under Permit by Rule or Conditional Authorization, I will also be required to provide required financial assurances by January 1, 1994, and conduct a Phase I environmental assessment by January 1, 1995.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are substantial penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

F. J. Dodge

Name (Print or Type)

[Signature]  
Signature

Commanding Officer

Title

8/8/94  
Date Signed

## OPERATING REQUIREMENTS:

Please note that generators treating hazardous waste onsite are required to comply with a number of operating requirements which differ depending on the tier(s) under which one operates. These operating requirements are set forth in the statutes and regulations, some of which are referenced in the Tier-Specific Facsheets.

## SUBMISSION PROCEDURES:

You must submit two copies of this completed notification by certified mail, return receipt requested, to:

Department of Toxic Substances Control  
Form 1772  
Onsite Hazardous Waste Treatment Unit  
400 P Street, 4th Floor (walk in only)  
P.O. Box 806  
Sacramento, CA 95812-0806.

You must also submit one copy of the notification and attachments to the local regulatory agency in your jurisdiction as listed in the instruction materials. You must also retain a copy as part of your operating record.

All three forms must have original signatures, not photocopies.

**CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS****UNIT SPECIFIC NOTIFICATION**

(pursuant to Health and Safety Code Section 25201.5(c))

UNIT NAME AIMD SILVER RECOVERY UNIT, HANGAR 41UNIT ID NUMBER Unit 1

NUMBER OF TREATMENT DEVICES: \_\_\_\_\_

Tank(s)

2 Container(s)

Each unit must be clearly identified and labeled on the plot plan attached to Form 1772. Assign your own unique number to each unit. The number can be sequential (1, 2, 3) or using any system you choose.

Enter the estimated monthly total volume of hazardous waste treated by this unit. This should be the maximum or highest amount treated in any month. Indicate in the narrative (Section II) if your operations have seasonal variations.

**I. WASTESTREAMS AND TREATMENT PROCESSES:**Estimated Monthly Total Volume Treated: \_\_\_\_\_ pounds and/or 2 gallons

The following are the eligible wastestreams and treatment processes. Please check all applicable boxes:

1. Treats resins mixed in accordance with the manufacturer's instructions.
2. Treat containers of 110 gallons or less capacity that contained hazardous waste by rinsing or physical processes, such as crushing, shredding, grinding, or puncturing.
3. Drying special wastes, as classified by the department pursuant to title 22, CCR, section 66261.124, by pressing or by passive or heat-aided evaporation to remove water.
4. Magnetic separation or screening to remove components from special waste, as classified by the department pursuant to title 22, CCR, section 66261.124.
5. Neutralize acidic or alkaline (base) wastes from the regeneration of ion exchange media used to demineralize water. (This waste cannot contain more than 10 percent acid or base by weight to be eligible for conditional exemption.)
6. Neutralize acidic or alkaline (base) wastes from the food processing industry.
7. Recovery of silver from photofinishing. The volume limit for conditional exemption is 500 gallons per generator (at the same location) in any calendar month.
8. Gravity separation of the following, including the use of flocculants and demulsifiers if
  - a. The settling of solids from the waste where the resulting aqueous/liquid stream is not hazardous.
  - b. The separation of oil/water mixtures and separation sludges, if the average oil recovered per month is less than 25 barrels (42 gallons per barrel).
9. Neutralizing acidic or alkaline (base) material by a state certified laboratory or a laboratory operated by an educational institution. (To be eligible for conditional exemption, this waste cannot contain more than 10 percent acid or base by weight.)

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

II. NARRATIVE DESCRIPTIONS: Provide a brief description of the specific waste treated and the treatment process used.

- 1. SPECIFIC WASTE TYPES TREATED: Spent X-RAY FIXER  
CONTAINING SILVER.
- 2. TREATMENT PROCESS(ES) USED: ION EXCHANGE

III. RESIDUAL MANAGEMENT: Check Yes or No to each question as it applies to all residuals from this treatment unit.

- |                                     |                                     |  |
|-------------------------------------|-------------------------------------|--|
| YES                                 | NO                                  |  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 1. Do you discharge non-hazardous aqueous waste to a publicly owned treatment works (POTW)/sewer?  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 2. Do you discharge non-hazardous aqueous waste under an NPDES permit?   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 3. Do you have your residual hazardous waste hauled offsite by a registered hazardous waste hauler?<br>If you do, where is the waste sent? Check all that apply. |
|                                     |                                     | <input checked="" type="checkbox"/> a. Offsite recycling   |
|                                     |                                     | <input type="checkbox"/> b. Thermal treatment  |
|                                     |                                     | <input type="checkbox"/> c. Disposal to land   |
|                                     |                                     | <input type="checkbox"/> d. Further treatment  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 4. Do you dispose of non-hazardous solid waste residues at an offsite location?  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 5. Other method of disposal. Specify: _____  |

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT:

In order to demonstrate eligibility for one of the onsite treatment tiers, facilities are required to provide the basis for determining that a hazardous waste permit is not required under the federal Resource Conservation and Recovery Act (RCRA) and the federal regulations adopted under RCRA (Title 40, Code of Federal Regulations (CFR)).

Choose the reason(s) that describe the operation of your onsite treatment units:

- 1. The hazardous waste being treated is not a hazardous waste under federal law although it is regulated as a hazardous waste under California state law.
- 2. The waste is treated in wastewater treatment units (tanks), as defined in 40 CFR Part 260.10, and discharged to a publicly owned treatment works (POTW)/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.

**CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION**  
(pursuant to Health and Safety Code Section 25201.5(c))

**IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT: (continued)**

- 3. The waste is treated in elementary neutralization units, as defined in 40 CFR Part 260.10, and discharged to a POTW/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.
- 4. The waste is treated in a totally enclosed treatment facility as defined in 40 CFR Part 260.10; 40 CFR 264.1(g)(5).
- 5. The company generates no more than 100 kg (approximately 27 gallons) of hazardous waste in a calendar month and is eligible as a federal conditionally exempt small quantity generator. 40 CFR 260.10 and 40 CFR 261.5.
- 6. The waste is treated in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month. 40 CFR 262.34, 40 CFR 270.1(c)(2)(i), and the Preamble to the March 24, 1986 Federal Register.
- 7. Recyclable materials are reclaimed to recover economically significant amounts of silver or other precious metals. 40 CFR 261.6(a)(2)(iv), 40 CFR 264.1(g)(2), and 40 CFR 266.70.
- 8. Empty container rinsing and/or treatment. 40 CFR 261.7.
- 9. Other: Specify: \_\_\_\_\_

**V. TRANSPORTABLE TREATMENT UNIT: Check Yes or No. Please refer to the Instructions for more information.**

- |                          |                                     |  |
|--------------------------|-------------------------------------|--|
| <b>YES</b>               | <b>NO</b>                           |  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Is this unit a Transportable Treatment Unit? |

If you answered yes, you must also complete and attach Form 1772E to this page.

The Tier-Specific Factsheets contain a summary of the operating requirements for this category. Please review those requirements carefully before completing or submitting this notification package.

**CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS****UNIT SPECIFIC NOTIFICATION**

(pursuant to Health and Safety Code Section 25201.5(c))

UNIT NAME SILVER RECOVERY UNIT, BLDG. 16UNIT ID NUMBER Unit 2BRANCH MEDICAL CLINIC

NUMBER OF TREATMENT DEVICES: \_\_\_\_\_ Tank(s)

2 Container(s)

Each unit must be clearly identified and labeled on the plot plan attached to Form 1772. Assign your own unique number to each unit. The number can be sequential (1, 2, 3) or using any system you choose.

Enter the estimated monthly total volume of hazardous waste treated by this unit. This should be the maximum or highest amount treated in any month. Indicate in the narrative (Section II) if your operations have seasonal variations.

**I. WASTESTREAMS AND TREATMENT PROCESSES:**Estimated Monthly Total Volume Treated: \_\_\_\_\_ pounds and/or 10 gallons

The following are the eligible wastestreams and treatment processes. Please check all applicable boxes:

- 1. Treats resins mixed in accordance with the manufacturer's instructions.
- 2. Treat containers of 110 gallons or less capacity that contained hazardous waste by rinsing or physical processes, such as crushing, shredding, grinding, or puncturing.
- 3. Drying special wastes, as classified by the department pursuant to title 22, CCR, section 66261.124, by pressing or by passive or heat-aided evaporation to remove water.
- 4. Magnetic separation or screening to remove components from special waste, as classified by the department pursuant to title 22, CCR, section 66261.124.
- 5. Neutralize acidic or alkaline (base) wastes from the regeneration of ion exchange media used to demineralize water. (This waste cannot contain more than 10 percent acid or base by weight to be eligible for conditional exemption.)
- 6. Neutralize acidic or alkaline (base) wastes from the food processing industry.
- 7. Recovery of silver from photofinishing. The volume limit for conditional exemption is 500 gallons per generator (at the same location) in any calendar month.
- 8. Gravity separation of the following, including the use of flocculants and demulsifiers if
  - a. The settling of solids from the waste where the resulting aqueous/liquid stream is not hazardous.
  - b. The separation of oil/water mixtures and separation sludges, if the average oil recovered per month is less than 25 barrels (42 gallons per barrel).
- 9. Neutralizing acidic or alkaline (base) material by a state certified laboratory or a laboratory operated by an educational institution. (To be eligible for conditional exemption, this waste cannot contain more than 10 percent acid or base by weight.)

**CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION**  
(pursuant to Health and Safety Code Section 25201.5(c))

**II. NARRATIVE DESCRIPTIONS:** *Provide a brief description of the specific waste treated and the treatment process used.*

1. SPECIFIC WASTE TYPES TREATED: SPENT X-RAY FIXER CONTAINING SILVER.
2. TREATMENT PROCESS(ES) USED: ION EXCHANGE

**III. RESIDUAL MANAGEMENT:** *Check Yes or No to each question as it applies to all residuals from this treatment unit.*

- | YES                                 | NO                                  |   |
|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 1. Do you discharge non-hazardous aqueous waste to a publicly owned treatment works (POTW)/sewer?   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 2. Do you discharge non-hazardous aqueous waste under an NPDES permit?  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 3. Do you have your residual hazardous waste hauled offsite by a registered hazardous waste hauler?<br>If you do, where is the waste sent? <i>Check all that apply.</i> |
|                                     |                                     | <input checked="" type="checkbox"/> a. Offsite recycling  |
|                                     |                                     | <input type="checkbox"/> b. Thermal treatment   |
|                                     |                                     | <input type="checkbox"/> c. Disposal to land  |
|                                     |                                     | <input type="checkbox"/> d. Further treatment   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 4. Do you dispose of non-hazardous solid waste residues at an offsite location?   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 5. Other method of disposal. Specify: _____   |

**IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT:**

*In order to demonstrate eligibility for one of the onsite treatment tiers, facilities are required to provide the basis for determining that a hazardous waste permit is not required under the federal Resource Conservation and Recovery Act (RCRA) and the federal regulations adopted under RCRA (Title 40, Code of Federal Regulations (CFR)).*

*Choose the reason(s) that describe the operation of your onsite treatment units:*

1. The hazardous waste being treated is not a hazardous waste under federal law although it is regulated as a hazardous waste under California state law.
2. The waste is treated in wastewater treatment units (tanks), as defined in 40 CFR Part 260.10, and discharged to a publicly owned treatment works (POTW)/sewerage agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT: (continued)

- 3. The waste is treated in elementary neutralization units, as defined in 40 CFR Part 260.10, and discharged to a POTW/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.
- 4. The waste is treated in a totally enclosed treatment facility as defined in 40 CFR Part 260.10; 40 CFR 264.1(g)(5).
- 5. The company generates no more than 100 kg (approximately 27 gallons) of hazardous waste in a calendar month and is eligible as a federal conditionally exempt small quantity generator. 40 CFR 260.10 and 40 CFR 261.5.
- 6. The waste is treated in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month. 40 CFR 262.34, 40 CFR 270.1(c)(2)(i), and the Preamble to the March 24, 1986 Federal Register.
- 7. Recyclable materials are reclaimed to recover economically significant amounts of silver or other precious metals. 40 CFR 261.6(a)(2)(iv), 40 CFR 264.1(g)(2), and 40 CFR 266.70.
- 8. Empty container rinsing and/or treatment. 40 CFR 261.7.
- 9. Other: Specify: \_\_\_\_\_

V. TRANSPORTABLE TREATMENT UNIT: Check Yes or No. Please refer to the Instructions for more information.

- |                          |                                     |  |
|--------------------------|-------------------------------------|--|
| YES                      | NO                                  |  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Is this unit a Transportable Treatment Unit? |

If you answered yes, you must also complete and attach Form 1772E to this page.

The Tier-Specific Factsheets contain a summary of the operating requirements for this category. Please review those requirements carefully before completing or submitting this notification package.

**CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS****UNIT SPECIFIC NOTIFICATION**

(pursuant to Health and Safety Code Section 25201.5(c))

UNIT NAME SILVER RECOVERY UNIT, BLDG. 400UNIT ID NUMBER unit 3SHOP 94421 GRAPHIC ARTS

NUMBER OF TREATMENT DEVICES: \_\_\_\_\_ Tank(s)

2 Container(s)

Each unit must be clearly identified and labeled on the plot plan attached to Form 1772. Assign your own unique number to each unit. The number can be sequential (1, 2, 3) or using any system you choose.

Enter the estimated monthly total volume of hazardous waste treated by this unit. This should be the maximum or highest amount treated in any month. Indicate in the narrative (Section II) if your operations have seasonal variations.

**I. WASTESTREAMS AND TREATMENT PROCESSES:**Estimated Monthly Total Volume Treated: \_\_\_\_\_ pounds and/or 2 gallons

The following are the eligible wastestreams and treatment processes. Please check all applicable boxes:

1. Treats resins mixed in accordance with the manufacturer's instructions.
2. Treat containers of 110 gallons or less capacity that contained hazardous waste by rinsing or physical processes, such as crushing, shredding, grinding, or puncturing.
3. Drying special wastes, as classified by the department pursuant to title 22, CCR, section 66261.124, by pressing or by passive or heat-aided evaporation to remove water.
4. Magnetic separation or screening to remove components from special waste, as classified by the department pursuant to title 22, CCR, section 66261.124.
5. Neutralize acidic or alkaline (base) wastes from the regeneration of ion exchange media used to demineralize water. (This waste cannot contain more than 10 percent acid or base by weight to be eligible for conditional exemption.)
6. Neutralize acidic or alkaline (base) wastes from the food processing industry.
7. Recovery of silver from photofinishing. The volume limit for conditional exemption is 500 gallons per generator (at the same location) in any calendar month.
8. Gravity separation of the following, including the use of flocculants and demulsifiers if
- a. The settling of solids from the waste where the resulting aqueous/liquid stream is not hazardous.
- b. The separation of oil/water mixtures and separation sludges, if the average oil recovered per month is less than 25 barrels (42 gallons per barrel).
9. Neutralizing acidic or alkaline (base) material by a state certified laboratory or a laboratory operated by an educational institution. (To be eligible for conditional exemption, this waste cannot contain more than 10 percent acid or base by weight.)

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

II. NARRATIVE DESCRIPTIONS: Provide a brief description of the specific waste treated and the treatment process used.

- 1. SPECIFIC WASTE TYPES TREATED: PHOTOGRAPHIC WASTES - SPENT  
FIXER AND DEVELOPER.
- 2. TREATMENT PROCESS(ES) USED: ELECTROLYTIC RECOVERY (CARTRIDGE)

III. RESIDUAL MANAGEMENT: Check Yes or No to each question as it applies to all residuals from this treatment unit.

- |                                     |                                     |  |
|-------------------------------------|-------------------------------------|--|
| YES                                 | NO                                  |  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 1. Do you discharge non-hazardous aqueous waste to a publicly owned treatment works (POTW)/sewer?  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 2. Do you discharge non-hazardous aqueous waste under an NPDES permit?   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 3. Do you have your residual hazardous waste hauled offsite by a registered hazardous waste hauler?<br>If you do, where is the waste sent? Check all that apply. |
|                                     |                                     | <input checked="" type="checkbox"/> a. Offsite recycling   |
|                                     |                                     | <input checked="" type="checkbox"/> b. Thermal treatment   |
|                                     |                                     | <input checked="" type="checkbox"/> c. Disposal to land  |
|                                     |                                     | <input checked="" type="checkbox"/> d. Further treatment   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 4. Do you dispose of non-hazardous solid waste residues at an offsite location?  |
| <input type="checkbox"/>            | <input type="checkbox"/>            | 5. Other method of disposal. Specify: _____  |

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT:

In order to demonstrate eligibility for one of the onsite treatment tiers, facilities are required to provide the basis for determining that a hazardous waste permit is not required under the federal Resource Conservation and Recovery Act (RCRA) and the federal regulations adopted under RCRA (Title 40, Code of Federal Regulations (CFR)).

Choose the reason(s) that describe the operation of your onsite treatment units:

- 1. The hazardous waste being treated is not a hazardous waste under federal law although it is regulated as a hazardous waste under California state law.
- 2. (Silver Recovery Units)  
The waste is treated in wastewater treatment units (tanks), as defined in 40 CFR Part 260.10, and discharged to a publicly owned treatment works (POTW)/sewerage agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT: (continued)

- 3. The waste is treated in elementary neutralization units, as defined in 40 CFR Part 260.10, and discharged to a POTW/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.
- 4. The waste is treated in a totally enclosed treatment facility as defined in 40 CFR Part 260.10; 40 CFR 264.1(g)(5).
- 5. The company generates no more than 100 kg (approximately 27 gallons) of hazardous waste in a calendar month and is eligible as a federal conditionally exempt small quantity generator. 40 CFR 260.10 and 40 CFR 261.5.
- 6. The waste is treated in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month. 40 CFR 262.34, 40 CFR 270.1(c)(2)(i), and the Preamble to the March 24, 1986 Federal Register.
- 7. Recyclable materials are reclaimed to recover economically significant amounts of silver or other precious metals. 40 CFR 261.6(a)(2)(iv), 40 CFR 264.1(g)(2), and 40 CFR 266.70.
- 8. Empty container rinsing and/or treatment. 40 CFR 261.7.
- 9. Other. Specify: \_\_\_\_\_

V. TRANSPORTABLE TREATMENT UNIT: Check Yes or No. Please refer to the Instructions for more information.

- |                          |                                     |  |
|--------------------------|-------------------------------------|--|
| YES                      | NO                                  |  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Is this unit a Transportable Treatment Unit? |

If you answered yes, you must also complete and attach Form 1772E to this page.

The Tier-Specific Factsheets contain a summary of the operating requirements for this category. Please review those requirements carefully before completing or submitting this notification package.

**CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS**

**UNIT SPECIFIC NOTIFICATION**

(pursuant to Health and Safety Code Section 25201.5(c))

UNIT NAME SILVER RECOVERY UNIT, BLDG. 5 UNIT ID NUMBER Unit 4  
SHOP 93333 PHOTO LAB  
 NUMBER OF TREATMENT DEVICES: \_\_\_\_\_ Tank(s) 2 Container(s)

Each unit must be clearly identified and labeled on the plot plan attached to Form 1772. Assign your own unique number to each unit. The number can be sequential (1, 2, 3) or using any system you choose.

Enter the estimated monthly total volume of hazardous waste treated by this unit. This should be the maximum or highest amount treated in any month. Indicate in the narrative (Section II) if your operations have seasonal variations.

**I. WASTESTREAMS AND TREATMENT PROCESSES:**

Estimated Monthly Total Volume Treated: \_\_\_\_\_ pounds and/or 2 gallons

The following are the eligible wastestreams and treatment processes. Please check all applicable boxes:

- 1. Treats resins mixed in accordance with the manufacturer's instructions.
- 2. Treat containers of 110 gallons or less capacity that contained hazardous waste by rinsing or physical processes, such as crushing, shredding, grinding, or puncturing.
- 3. Drying special wastes, as classified by the department pursuant to title 22, CCR, section 66261.124, by pressing or by passive or heat-aided evaporation to remove water.
- 4. Magnetic separation or screening to remove components from special waste, as classified by the department pursuant to title 22, CCR, section 66261.124.
- 5. Neutralize acidic or alkaline (base) wastes from the regeneration of ion exchange media used to demineralize water. (This waste cannot contain more than 10 percent acid or base by weight to be eligible for conditional exemption.)
- 6. Neutralize acidic or alkaline (base) wastes from the food processing industry.
- 7. Recovery of silver from photofinishing. The volume limit for conditional exemption is 500 gallons per generator (at the same location) in any calendar month.
- 8. Gravity separation of the following, including the use of flocculants and demulsifiers if
  - a. The settling of solids from the waste where the resulting aqueous/liquid stream is not hazardous.
  - b. The separation of oil/water mixtures and separation sludges, if the average oil recovered per month is less than 25 barrels (42 gallons per barrel).
- 9. Neutralizing acidic or alkaline (base) material by a state certified laboratory or a laboratory operated by an educational institution. (To be eligible for conditional exemption, this waste cannot contain more than 10 percent acid or base by weight.)

**CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION**  
(pursuant to Health and Safety Code Section 25201.5(c))

**II. NARRATIVE DESCRIPTIONS:** Provide a brief description of the specific waste treated and the treatment process used.

1. SPECIFIC WASTE TYPES TREATED: PHOTOGRAPHIC WASTES - SPENT  
FIXER AND DEVELOPER
2. TREATMENT PROCESS(ES) USED: ELECTROLYTIC RECOVERY (CARTRIDGE)

**III. RESIDUAL MANAGEMENT:** Check Yes or No to each question as it applies to all residuals from this treatment unit.

- |   |  |  |
|---|--|--|
| <p>YES<br/><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> | <p>NO<br/><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> | <p>1. Do you discharge non-hazardous aqueous waste to a publicly owned treatment works (POTW)/sewer?</p> <p>2. Do you discharge non-hazardous aqueous waste under an NPDES permit?</p> <p>3. Do you have your residual hazardous waste hauled offsite by a registered hazardous waste hauler?<br/>If you do, where is the waste sent? Check all that apply.</p> <p style="margin-left: 20px;"><input checked="" type="checkbox"/> a. Offsite recycling</p> <p style="margin-left: 20px;"><input checked="" type="checkbox"/> b. Thermal treatment</p> <p style="margin-left: 20px;"><input checked="" type="checkbox"/> c. Disposal to land</p> <p style="margin-left: 20px;"><input checked="" type="checkbox"/> d. Further treatment</p> <p>4. Do you dispose of non-hazardous solid waste residues at an offsite location?</p> <p>5. Other method of disposal. Specify: _____</p> |
|---|--|--|

**IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT:**

*In order to demonstrate eligibility for one of the onsite treatment tiers, facilities are required to provide the basis for determining that a hazardous waste permit is not required under the federal Resource Conservation and Recovery Act (RCRA) and the federal regulations adopted under RCRA (Title 40, Code of Federal Regulations (CFR)).*

*Choose the reason(s) that describe the operation of your onsite treatment units:*

1. The hazardous waste being treated is not a hazardous waste under federal law although it is regulated as a hazardous waste under California state law.
2. The waste is treated in <sup>(Silver Recovery Units)</sup> wastewater treatment units (tanks), as defined in 40 CFR Part 260.10, and discharged to a publicly owned treatment works (POTW)/sewerage agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

## IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT: (continued)

3. The waste is treated in elementary neutralization units, as defined in 40 CFR Part 260.10, and discharged to a POTW/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.
4. The waste is treated in a totally enclosed treatment facility as defined in 40 CFR Part 260.10; 40 CFR 264.1(g)(5).
5. The company generates no more than 100 kg (approximately 27 gallons) of hazardous waste in a calendar month and is eligible as a federal conditionally exempt small quantity generator. 40 CFR 260.10 and 40 CFR 261.5.
6. The waste is treated in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month. 40 CFR 262.34, 40 CFR 270.1(c)(2)(i), and the Preamble to the March 24, 1986 Federal Register.
7. Recyclable materials are reclaimed to recover economically significant amounts of silver or other precious metals. 40 CFR 261.6(a)(2)(iv), 40 CFR 264.1(g)(2), and 40 CFR 266.70.
8. Empty container rinsing and/or treatment. 40 CFR 261.7.
9. Other: Specify: \_\_\_\_\_

## V. TRANSPORTABLE TREATMENT UNIT: Check Yes or No. Please refer to the Instructions for more information.

- YES NO  
  Is this unit a Transportable Treatment Unit?

If you answered yes, you must also complete and attach Form 1772E to this page.

The Tier-Specific Factsheets contain a summary of the operating requirements for this category. Please review those requirements carefully before completing or submitting this notification package.

**CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS****UNIT SPECIFIC NOTIFICATION**

(pursuant to Health and Safety Code Section 25201.5(c))

UNIT NAME SILVER RECOVERY UNIT, BLDG. 5 UNIT ID NUMBER Unit 5  
SHOP 93434 NDI RADIOGRAPHIC LAB  
 NUMBER OF TREATMENT DEVICES:      Tank(s)   2   Container(s)

Each unit must be clearly identified and labeled on the plot plan attached to Form 1772. Assign your own unique number to each unit. The number can be sequential (1, 2, 3) or using any system you choose.

Enter the estimated monthly total volume of hazardous waste treated by this unit. This should be the maximum or highest amount treated in any month. Indicate in the narrative (Section II) if your operations have seasonal variations.

**I. WASTESTREAMS AND TREATMENT PROCESSES:**

Estimated Monthly Total Volume Treated:      pounds and/or   10   gallons

The following are the eligible wastestreams and treatment processes. Please check all applicable boxes:

- 1. Treats resins mixed in accordance with the manufacturer's instructions.
- 2. Treat containers of 110 gallons or less capacity that contained hazardous waste by rinsing or physical processes, such as crushing, shredding, grinding, or puncturing.
- 3. Drying special wastes, as classified by the department pursuant to title 22, CCR, section 66261.124, by pressing or by passive or heat-aided evaporation to remove water.
- 4. Magnetic separation or screening to remove components from special waste, as classified by the department pursuant to title 22, CCR, section 66261.124.
- 5. Neutralize acidic or alkaline (base) wastes from the regeneration of ion exchange media used to demineralize water. (This waste cannot contain more than 10 percent acid or base by weight to be eligible for conditional exemption.)
- 6. Neutralize acidic or alkaline (base) wastes from the food processing industry.
- 7. Recovery of silver from photofinishing. The volume limit for conditional exemption is 500 gallons per generator (at the same location) in any calendar month.
- 8. Gravity separation of the following, including the use of flocculants and demulsifiers if
  - a. The settling of solids from the waste where the resulting aqueous/liquid stream is not hazardous.
  - b. The separation of oil/water mixtures and separation sludges, if the average oil recovered per month is less than 25 barrels (42 gallons per barrel).
- 9. Neutralizing acidic or alkaline (base) material by a state certified laboratory or a laboratory operated by an educational institution. (To be eligible for conditional exemption, this waste cannot contain more than 10 percent acid or base by weight.)

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
 UNIT SPECIFIC NOTIFICATION  
 (pursuant to Health and Safety Code Section 25201.5(c))

II. NARRATIVE DESCRIPTIONS: Provide a brief description of the specific waste treated and the treatment process used.

1. SPECIFIC WASTE TYPES TREATED: PHOTOGRAPHIC WASTES - SPENT DEVELOPER AND FIXER.
2. TREATMENT PROCESS(ES) USED: ELECTROLYTIC RECOVERY (CARTRIDGE)

III. RESIDUAL MANAGEMENT: Check Yes or No to each question as it applies to all residuals from this treatment unit.

- | YES                                 | NO                                  |  |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 1. Do you discharge non-hazardous aqueous waste to a publicly owned treatment works (POTW)/sewer?  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 2. Do you discharge non-hazardous aqueous waste under an NPDES permit?   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 3. Do you have your residual hazardous waste hauled offsite by a registered hazardous waste hauler?<br>If you do, where is the waste sent? Check all that apply. |
|                                     |                                     | <input checked="" type="checkbox"/> a. Offsite recycling   |
|                                     |                                     | <input checked="" type="checkbox"/> b. Thermal treatment   |
|                                     |                                     | <input checked="" type="checkbox"/> c. Disposal to land  |
|                                     |                                     | <input checked="" type="checkbox"/> d. Further treatment   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 4. Do you dispose of non-hazardous solid waste residues at an offsite location?  |
| <input type="checkbox"/>            | <input type="checkbox"/>            | 5. Other method of disposal. Specify: _____  |

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT:

In order to demonstrate eligibility for one of the onsite treatment tiers, facilities are required to provide the basis for determining that a hazardous waste permit is not required under the federal Resource Conservation and Recovery Act (RCRA) and the federal regulations adopted under RCRA (Title 40, Code of Federal Regulations (CFR)).

Choose the reason(s) that describe the operation of your onsite treatment units:

1. The hazardous waste being treated is not a hazardous waste under federal law although it is regulated as a hazardous waste under California state law.
2. The waste is treated in wastewater treatment units (tanks), as defined in 40 CFR Part 260.10, and discharged to a publicly owned treatment works (POTW)/sewerage agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.  
 (Silver Recovery Units)

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT: (continued)

- 3. The waste is treated in elementary neutralization units, as defined in 40 CFR Part 260.10, and discharged to a POTW/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.
- 4. The waste is treated in a totally enclosed treatment facility as defined in 40 CFR Part 260.10; 40 CFR 264.1(g)(5).
- 5. The company generates no more than 100 kg (approximately 27 gallons) of hazardous waste in a calendar month and is eligible as a federal conditionally exempt small quantity generator. 40 CFR 260.10 and 40 CFR 261.5.
- 6. The waste is treated in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month. 40 CFR 262.34, 40 CFR 270.1(c)(2)(i), and the Preamble to the March 24, 1986 Federal Register.
- 7. Recyclable materials are reclaimed to recover economically significant amounts of silver or other precious metals. 40 CFR 261.6(a)(2)(iv), 40 CFR 264.1(g)(2), and 40 CFR 266.70.
- 8. Empty container rinsing and/or treatment. 40 CFR 261.7.
- 9. Other: Specify: \_\_\_\_\_

V. TRANSPORTABLE TREATMENT UNIT: Check Yes or No. Please refer to the Instructions for more information.

- YES      NO
- Is this unit a Transportable Treatment Unit?

If you answered yes, you must also complete and attach Form 1772E to this page.

The Tier-Specific Factsheets contain a summary of the operating requirements for this category. Please review those requirements carefully before completing or submitting this notification package.

**CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS****UNIT SPECIFIC NOTIFICATION**

(pursuant to Health and Safety Code Section 25201.5(c))

UNIT NAME Rinse Shop, Bldg. 360 Shop 96215 UNIT ID NUMBER Unit 6NUMBER OF TREATMENT DEVICES: \_\_\_\_\_ Tank(s) 1 Container(s)

Each unit must be clearly identified and labeled on the plot plan attached to Form 1772. Assign your own unique number to each unit. The number can be sequential (1, 2, 3) or using any system you choose.

Enter the estimated monthly total volume of hazardous waste treated by this unit. This should be the maximum or highest amount treated in any month. Indicate in the narrative (Section II) if your operations have seasonal variations.

**I. WASTESTREAMS AND TREATMENT PROCESSES:**Estimated Monthly Total Volume Treated: \_\_\_\_\_ pounds and/or 5 gallons

The following are the eligible wastestreams and treatment processes. Please check all applicable boxes:

1. Treats resins mixed in accordance with the manufacturer's instructions.
2. Treat containers of 110 gallons or less capacity that contained hazardous waste by rinsing or physical processes, such as crushing, shredding, grinding, or puncturing.
3. Drying special wastes, as classified by the department pursuant to title 22, CCR, section 66261.124, by pressing or by passive or heat-aided evaporation to remove water.
4. Magnetic separation or screening to remove components from special waste, as classified by the department pursuant to title 22, CCR, section 66261.124.
5. Neutralize acidic or alkaline (base) wastes from the regeneration of ion exchange media used to demineralize water. (This waste cannot contain more than 10 percent acid or base by weight to be eligible for conditional exemption.)
6. Neutralize acidic or alkaline (base) wastes from the food processing industry.
7. Recovery of silver from photofinishing. The volume limit for conditional exemption is 500 gallons per generator (at the same location) in any calendar month.
8. Gravity separation of the following, including the use of flocculants and demulsifiers if
- a. The settling of solids from the waste where the resulting aqueous/liquid stream is not hazardous.
- b. The separation of oil/water mixtures and separation sludges, if the average oil recovered per month is less than 25 barrels (42 gallons per barrel).
9. Neutralizing acidic or alkaline (base) material by a state certified laboratory or a laboratory operated by an educational institution. (To be eligible for conditional exemption, this waste cannot contain more than 10 percent acid or base by weight.)

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

II. NARRATIVE DESCRIPTIONS: Provide a brief description of the specific waste treated and the treatment process used.

1. SPECIFIC WASTE TYPES TREATED: Empty Acid Bottles

2. TREATMENT PROCESS(ES) USED: Rinsing

III. RESIDUAL MANAGEMENT: Check Yes or No to each question as it applies to all residuals from this treatment unit.

YES NO

1. Do you discharge non-hazardous aqueous waste to a publicly owned treatment works (POTW)/sewer?

2. Do you discharge non-hazardous aqueous waste under an NPDES permit?

3. Do you have your residual hazardous waste hauled offsite by a registered hazardous waste hauler?  
If you do, where is the waste sent? Check all that apply.

a. Offsite recycling

b. Thermal treatment

c. Disposal to land

d. Further treatment

4. Do you dispose of non-hazardous solid waste residues at an offsite location?

5. Other method of disposal. Specify: \_\_\_\_\_

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT:

In order to demonstrate eligibility for one of the onsite treatment tiers, facilities are required to provide the basis for determining that a hazardous waste permit is not required under the federal Resource Conservation and Recovery Act (RCRA) and the federal regulations adopted under RCRA (Title 40, Code of Federal Regulations (CFR)).

Choose the reason(s) that describe the operation of your onsite treatment units:

1. The hazardous waste being treated is not a hazardous waste under federal law although it is regulated as a hazardous waste under California state law.

2. The waste is treated in wastewater treatment units (tanks), as defined in 40 CFR Part 260.10, and discharged to a publicly owned treatment works (POTW)/sewerage agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT: (continued)

- 3. The waste is treated in elementary neutralization units, as defined in 40 CFR Part 260.10, and discharged to a POTW/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.
- 4. The waste is treated in a totally enclosed treatment facility as defined in 40 CFR Part 260.10; 40 CFR 264.1(g)(5).
- 5. The company generates no more than 100 kg (approximately 27 gallons) of hazardous waste in a calendar month and is eligible as a federal conditionally exempt small quantity generator. 40 CFR 260.10 and 40 CFR 261.5.
- 6. The waste is treated in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month. 40 CFR 262.34, 40 CFR 270.1(c)(2)(i), and the Preamble to the March 24, 1986 Federal Register.
- 7. Recyclable materials are reclaimed to recover economically significant amounts of silver or other precious metals. 40 CFR 261.6(a)(2)(iv), 40 CFR 264.1(g)(2), and 40 CFR 266.70.
- 8. Empty container rinsing and/or treatment. 40 CFR 261.7.
- 9. Other: Specify: \_\_\_\_\_

V. TRANSPORTABLE TREATMENT UNIT: Check Yes or No. Please refer to the Instructions for more information.

- YES  NO
- Is this unit a Transportable Treatment Unit?

If you answered yes, you must also complete and attach Form 1772E to this page.

The Tier-Specific Factsheets contain a summary of the operating requirements for this category. Please review those requirements carefully before completing or submitting this notification package.

**CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS****UNIT SPECIFIC NOTIFICATION**

(pursuant to Health and Safety Code Section 25201.5(c))

UNIT NAME DRUM RINSE HOSE, Bldg. 32 Shop 93432UNIT ID NUMBER Unit 7

NUMBER OF TREATMENT DEVICES: \_\_\_\_\_ Tank(s)

2 Container(s)

Each unit must be clearly identified and labeled on the plot plan attached to Form 1772. Assign your own unique number to each unit. The number can be sequential (1, 2, 3) or using any system you choose.

Enter the estimated monthly total volume of hazardous waste treated by this unit. This should be the maximum or highest amount treated in any month. Indicate in the narrative (Section II) if your operations have seasonal variations.

**WASTESTREAMS AND TREATMENT PROCESSES:**Estimated Monthly Total Volume Treated: \_\_\_\_\_ pounds and/or 100 gallons

The following are the eligible wastestreams and treatment processes. Please check all applicable boxes:

1. Treats resins mixed in accordance with the manufacturer's instructions.
2. Treat containers of 110 gallons or less capacity that contained hazardous waste by rinsing or physical processes, such as crushing, shredding, grinding, or puncturing.
3. Drying special wastes, as classified by the department pursuant to title 22, CCR, section 66261.124, by pressing or by passive or heat-aided evaporation to remove water.
4. Magnetic separation or screening to remove components from special waste, as classified by the department pursuant to title 22, CCR, section 66261.124.
5. Neutralize acidic or alkaline (base) wastes from the regeneration of ion exchange media used to demineralize water. (This waste cannot contain more than 10 percent acid or base by weight to be eligible for conditional exemption.)
6. Neutralize acidic or alkaline (base) wastes from the food processing industry.
7. Recovery of silver from photofinishing. The volume limit for conditional exemption is 500 gallons per generator (at the same location) in any calendar month.
8. Gravity separation of the following, including the use of flocculants and demulsifiers if
  - a. The settling of solids from the waste where the resulting aqueous/liquid stream is not hazardous.
  - b. The separation of oil/water mixtures and separation sludges, if the average oil recovered per month is less than 25 barrels (42 gallons per barrel).
9. Neutralizing acidic or alkaline (base) material by a state certified laboratory or a laboratory operated by an educational institution. (To be eligible for conditional exemption, this waste cannot contain more than 10 percent acid or base by weight.)

**ONSITE HAZARDOUS WASTE  
TREATMENT NOTIFICATION FORM**

**PAGE 23 OF 35**

**CURRENT STATUS OF REGULATED RCRA UNITS  
HAZARDOUS WASTE FACILITY PERMIT  
CA 2170023236**

**THE ABOVE IDENTIFIED PAGE IS NOT  
AVAILABLE.**

**EXTENSIVE RESEARCH WAS PERFORMED BY  
NAVFAC SOUTHWEST TO LOCATE THIS PAGE.  
THIS PAGE HAS BEEN INSERTED AS A  
PLACEHOLDER AND WILL BE REPLACED  
SHOULD THE MISSING ITEM BE LOCATED.**

**QUESTIONS MAY BE DIRECTED TO:**

**DIANE C. SILVA  
RECORDS MANAGEMENT SPECIALIST  
NAVAL FACILITIES ENGINEERING COMMAND  
SOUTHWEST  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132**

**TELEPHONE: (619) 532-3676**

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT: (continued)

- 3. The waste is treated in elementary neutralization units, as defined in 40 CFR Part 260.10, and discharged to a POTW/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.
- 4. The waste is treated in a totally enclosed treatment facility as defined in 40 CFR Part 260.10; 40 CFR 264.1(g)(5).
- 5. The company generates no more than 100 kg (approximately 27 gallons) of hazardous waste in a calendar month and is eligible as a federal conditionally exempt small quantity generator. 40 CFR 260.10 and 40 CFR 261.5.
- 6. The waste is treated in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month. 40 CFR 262.34, 40 CFR 270.1(c)(2)(i), and the Preamble to the March 24, 1986 Federal Register.
- 7. Recyclable materials are reclaimed to recover economically significant amounts of silver or other precious metals. 40 CFR 261.6(a)(2)(iv), 40 CFR 264.1(g)(2), and 40 CFR 266.70.
- 8. Empty container rinsing and/or treatment. 40 CFR 261.7.
- 9. Other: Specify: \_\_\_\_\_

V. TRANSPORTABLE TREATMENT UNIT: Check Yes or No. Please refer to the Instructions for more information.

- |                          |                                     |  |
|--------------------------|-------------------------------------|--|
| YES                      | NO                                  |  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Is this unit a Transportable Treatment Unit? |

If you answered yes, you must also complete and attach Form 1772E to this page.

The Tier-Specific Factsheets contain a summary of the operating requirements for this category. Please review those requirements carefully before completing or submitting this notification package.

**ONSITE HAZARDOUS WASTE  
TREATMENT NOTIFICATION FORM**

**PAGE 25 OF 35**

**CURRENT STATUS OF REGULATED RCRA UNITS  
HAZARDOUS WASTE FACILITY PERMIT  
CA 2170023236**

**THE ABOVE IDENTIFIED PAGE IS NOT  
AVAILABLE.**

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SHOULD THE MISSING ITEM BE LOCATED.**

**QUESTIONS MAY BE DIRECTED TO:**

**DIANE C. SILVA  
RECORDS MANAGEMENT SPECIALIST  
NAVAL FACILITIES ENGINEERING COMMAND  
SOUTHWEST  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132**

**TELEPHONE: (619) 532-3676**

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

II. NARRATIVE DESCRIPTIONS: Provide a brief description of the specific waste treated and the treatment process used.

1. SPECIFIC WASTE TYPES TREATED: Empty Paint Stripper Drums

2. TREATMENT PROCESS(ES) USED: Rinsing

III. RESIDUAL MANAGEMENT: Check Yes or No to each question as it applies to all residuals from this treatment unit.

YES NO

1. Do you discharge non-hazardous aqueous waste to a publicly owned treatment works (POTW)/sewer?

2. Do you discharge non-hazardous aqueous waste under an NPDES permit?

3. Do you have your residual hazardous waste hauled offsite by a registered hazardous waste hauler?  
If you do, where is the waste sent? Check all that apply.

- a. Offsite recycling
- b. Thermal treatment
- c. Disposal to land
- d. Further treatment

4. Do you dispose of non-hazardous solid waste residues at an offsite location?

5. Other method of disposal. Specify: \_\_\_\_\_

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT:

In order to demonstrate eligibility for one of the onsite treatment tiers, facilities are required to provide the basis for determining that a hazardous waste permit is not required under the federal Resource Conservation and Recovery Act (RCRA) and the federal regulations adopted under RCRA (Title 40, Code of Federal Regulations (CFR)).

Choose the reason(s) that describe the operation of your onsite treatment units:

1. The hazardous waste being treated is not a hazardous waste under federal law although it is regulated as a hazardous waste under California state law.

2. The waste is treated in wastewater treatment units (tanks), as defined in 40 CFR Part 260.10, and discharged to a publicly owned treatment works (POTW)/sewerage agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.

CONDITIONALLY EXEMPT - SPECIFIED WASTESTREAMS  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code Section 25201.5(c))

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT: (continued)

- 3. The waste is treated in elementary neutralization units, as defined in 40 CFR Part 260.10, and discharged to a POTW/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.
- 4. The waste is treated in a totally enclosed treatment facility as defined in 40 CFR Part 260.10; 40 CFR 264.1(g)(5).
- 5. The company generates no more than 100 kg (approximately 27 gallons) of hazardous waste in a calendar month and is eligible as a federal conditionally exempt small quantity generator. 40 CFR 260.10 and 40 CFR 261.5.
- 6. The waste is treated in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month. 40 CFR 262.34, 40 CFR 270.1(c)(2)(i), and the Preamble to the March 24, 1986 Federal Register.
- 7. Recyclable materials are reclaimed to recover economically significant amounts of silver or other precious metals. 40 CFR 261.6(a)(2)(iv), 40 CFR 264.1(g)(2), and 40 CFR 266.70.
- 8. Empty container rinsing and/or treatment. 40 CFR 261.7.
- 9. Other: Specify: \_\_\_\_\_

V. TRANSPORTABLE TREATMENT UNIT: Check Yes or No. Please refer to the Instructions for more information.

- YES      NO
- Is this unit a Transportable Treatment Unit?

If you answered yes, you must also complete and attach Form 1772E to this page.

The Tier-Specific Factsheets contain a summary of the operating requirements for this category. Please review those requirements carefully before completing or submitting this notification package.

**CONDITIONALLY AUTHORIZED**  
 UNIT SPECIFIC NOTIFICATION  
 (pursuant to Health and Safety Code Section 25200.3)

UNIT NAME pH Adjustment Unit, Bldg 360  
Unit No. M-1304154

UNIT ID NUMBER Unit 9

NUMBER OF TREATMENT DEVICES: 1 Tank(s)           Container(s)

*Each unit must be clearly identified and labeled on the plot plan attached to Form 1772. Assign your own unique number to each unit. The number can be sequential (1, 2, 3) or you may use any system you choose.*

*Enter the estimated monthly total volume of hazardous waste treated by this unit. This should be the maximum or highest amount treated in any month. Indicate in the narrative (Section II) if your operations have seasonal variations.*

**I. WASTESTREAMS AND TREATMENT PROCESSES:**

Estimated Monthly Total Volume Treated:                      pounds and/or 200,000 gallons

*The following are the eligible wastestreams and treatment processes. Please check all applicable boxes:*

1. Aqueous wastes hazardous solely due to inorganics constituents, except asbestos, listed in title 22, CCR, section 66261.24(a)(1)(B) or (a)(2)(A) and which contain less than 1,400 ppm total of these constituents. (There is no volume limit for this wastestream.) Treatment is using:

- a. Phase separation, including precipitation, by filtration, centrifugation, or gravity settling, including the use of demulsifiers and flocculants.
- b. Ion exchange, including metallic replacement,
- c. Reverse osmosis
- d. Adsorption
- e. pH adjustment of aqueous waste with a pH of between 2.0 and 12.5
- f. Electrowinning of solutions, unless those solutions contain hydrochloric acid
- g. Reduction of solutions hazardous solely due to hexavalent chromium, to trivalent chromium with sodium bisulfite, sodium metabisulfite, sodium thiosulfate, ferrous chloride, ferrous sulfate, ferrous sulfide, or sulfur dioxide. The solution contains less than 750 ppm of hexavalent chromium.

2. Aqueous wastes hazardous solely due to organic constituents listed in title 22, CCR, section 66261.24(a)(1)(B) or (2)(B) and which contain less than 750 ppm total of these constituents. (There is no volume limit for this wastestream.) Treatment is using:

- a. Phase separation by filtration, centrifugation, or gravity settling, but excluding super critical fluid extraction.
- b. Adsorption

3. Sludges resulting from wastewater treatment, dusts, solid metal objects, and metal workings which are hazardous solely due to the presence of constituents, except asbestos, listed in title 22, CCR, section 66261.24(a)(1)(B) or (a)(2)(A) and which, for dusts only, contain less than 750 ppm total of these constituents. The monthly volume treated in this unit does not exceed 5,000 gallons or 45,000 pounds. Treatment is using:

- a. Physical processes which constitute treatment only because they change the physical properties of the waste, such as filtration, centrifugation, gravity settling, grinding, shredding, crushing, or compacting.
- b. Drying to remove water.
- c. Separation based on differences in physical properties, such as size, magnetism, or density.



**CONDITIONALLY AUTHORIZED  
UNIT SPECIFIC NOTIFICATION**  
(pursuant to Health and Safety Code Section 25200.3)

11. Spent cleaners and conditioners which are hazardous solely due to copper or copper compounds with less than 5000 ppm copper. The volume limit for conditional authorization is 1,000 gallons of this wastestream per facility in any calendar month. (These cleaners are limited to surfactants and detergents and do not contain microetch, etchant, plating or metal stripping solutions or solutions containing oxidizers, or any cleaner based on organic solvents). (These wastestreams and processes are only conditionally authorized until January 1, 1995, unless extended by the Department.) Treatment is using:
- a. Phase separation, including precipitation, by filtration, centrifugation, or gravity settling, including the use of demulsifiers and flocculants.
  - b. Ion exchange, including metallic replacement,
  - c. Reverse osmosis
  - d. Adsorption
  - e. pH adjustment of aqueous waste with a pH of between 2.0 and 12.5
  - f. Electrowinning of solutions, unless those solutions contain hydrochloric acid

II. **NARRATIVE DESCRIPTIONS:** *Provide a brief description of the specific waste treated and the treatment process used.*

1. SPECIFIC WASTE TYPES TREATED: Cooling Tower, Scrubber, Condensate and Process Tanks overflow drains.
2. TREATMENT PROCESS(ES) USED: Neutralization

III. **RESIDUAL MANAGEMENT:** *Check Yes or No to each question as it applies to all residuals from this treatment unit.*

- | YES                                 | NO                                  |   |
|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 1. Do you discharge non-hazardous aqueous waste to a publicly owned treatment works (POTW)/sewer?   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 2. Do you discharge non-hazardous aqueous waste under an NPDES permit?  |
| <input type="checkbox"/>            | <input type="checkbox"/>            | 3. Do you have your residual hazardous waste hauled offsite by a registered hazardous waste hauler?<br>If you do, where is the waste sent? <i>Check all that apply.</i> |
|                                     |                                     | <input checked="" type="checkbox"/> a. Offsite recycling  |
|                                     |                                     | <input checked="" type="checkbox"/> b. Thermal treatment  |
|                                     |                                     | <input checked="" type="checkbox"/> c. Disposal to land   |
|                                     |                                     | <input checked="" type="checkbox"/> d. Further treatment  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 4. Do you dispose of non-hazardous solid waste residues at an offsite location?   |
| <input type="checkbox"/>            | <input type="checkbox"/>            | 5. Other method of disposal. Specify: _____   |

11-01-01

CONDITIONALLY AUTHORIZED  
UNIT SPECIFIC NOTIFICATION  
(pursuant to Health and Safety Code)

IV. BASIS FOR NOT NEEDING A FEDERAL PERMIT:

*In order to demonstrate eligibility for one of the onsite treatment tiers, facilities are required to provide the basis for determining that a hazardous waste permit is not required under the federal Resource Conservation and Recovery Act (RCRA) and the federal regulations adopted under RCRA (Title 40, Code of Federal Regulations (CFR)).*

Choose the reason(s) that describe the operation of your onsite treatment units:

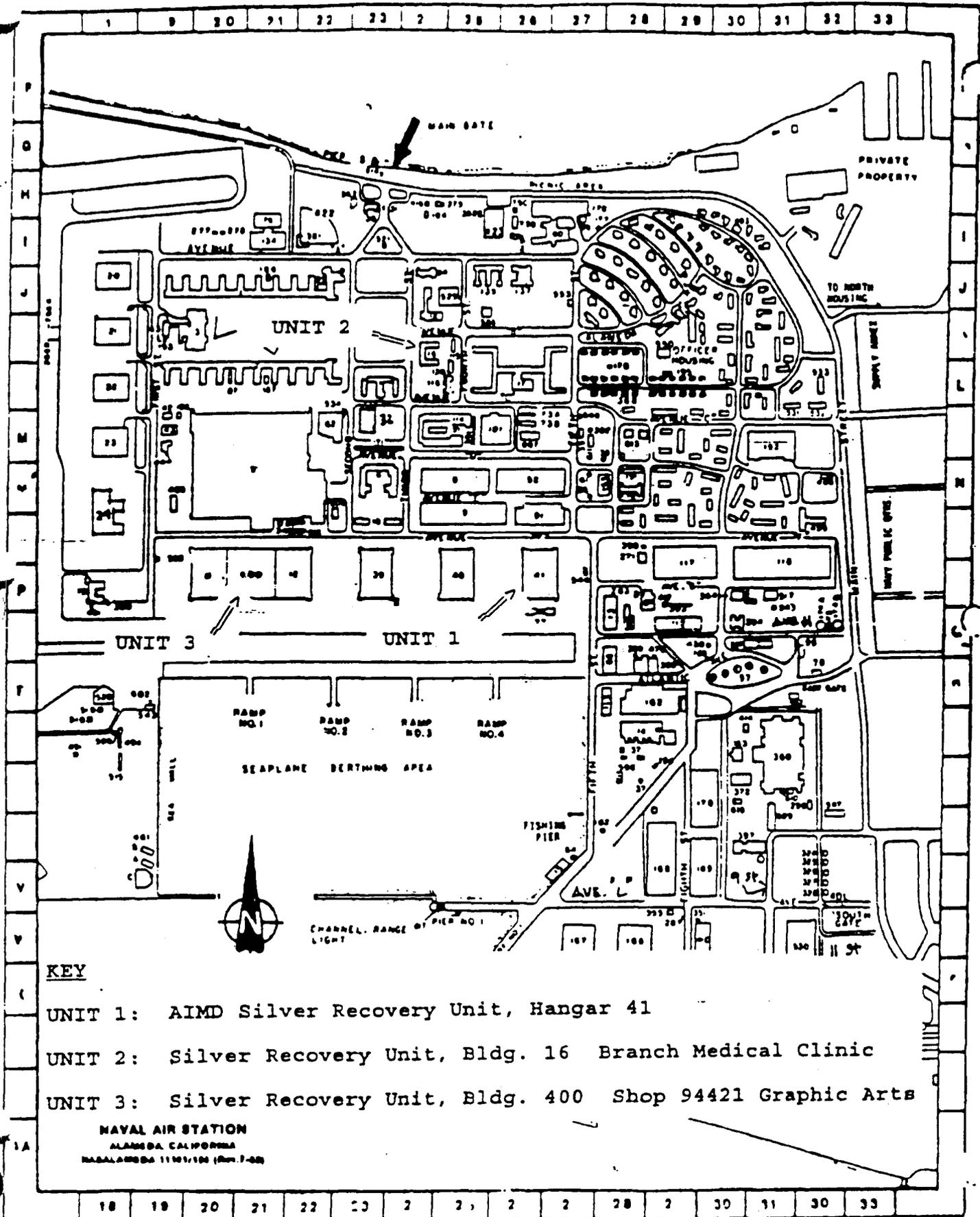
- 1. The hazardous waste being treated is not a hazardous waste under federal law although it is regulated as a hazardous waste under California state law.
- 2. The waste is treated in wastewater treatment units (tanks), as defined in 40 CFR Part 260.10, and discharged to a publicly owned treatment works (POTW)/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.
- 3. The waste is treated in elementary neutralization units, as defined in 40 CFR Part 260.10, and discharged to a POTW/sewering agency or under an NPDES permit. 40 CFR 264.1(g)(6) and 40 CFR 270.2.
- 4. The waste is treated in a totally enclosed treatment facility as defined in 40 CFR Part 260.10; 40 CFR 264.1(g)(5).
- 5. The company generates no more than 100 kg (approximately 27 gallons) of hazardous waste in a calendar month and is eligible as a federal conditionally exempt small quantity generator. 40 CFR 260.10 and 40 CFR 261.5.
- 6. The waste is treated in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month. 40 CFR 262.34, 40 CFR 270.1(c)(2)(i), and the Preamble to the March 24, 1986 Federal Register.
- 7. Recyclable materials are reclaimed to recover economically significant amounts of silver or other precious metals. 40 CFR 261.6(a)(2)(iv), 40 CFR 264.1(g)(2), and 40 CFR 266.70.
- 8. Empty container rinsing and/or treatment. 40 CFR 261.7.
- 9. Other. Specify: \_\_\_\_\_

V. TRANSPORTABLE TREATMENT UNIT: Check Yes or No. Please refer to the instructions for more information.

- YES      NO
- Is this unit a Transportable Treatment Unit?

If you answered yes, you must also complete and attach Form 1772E to this page.

The Tier-Specific Factsheets contain a summary of the operating requirements for this category. Please review those requirements carefully before completing or submitting this notification package.



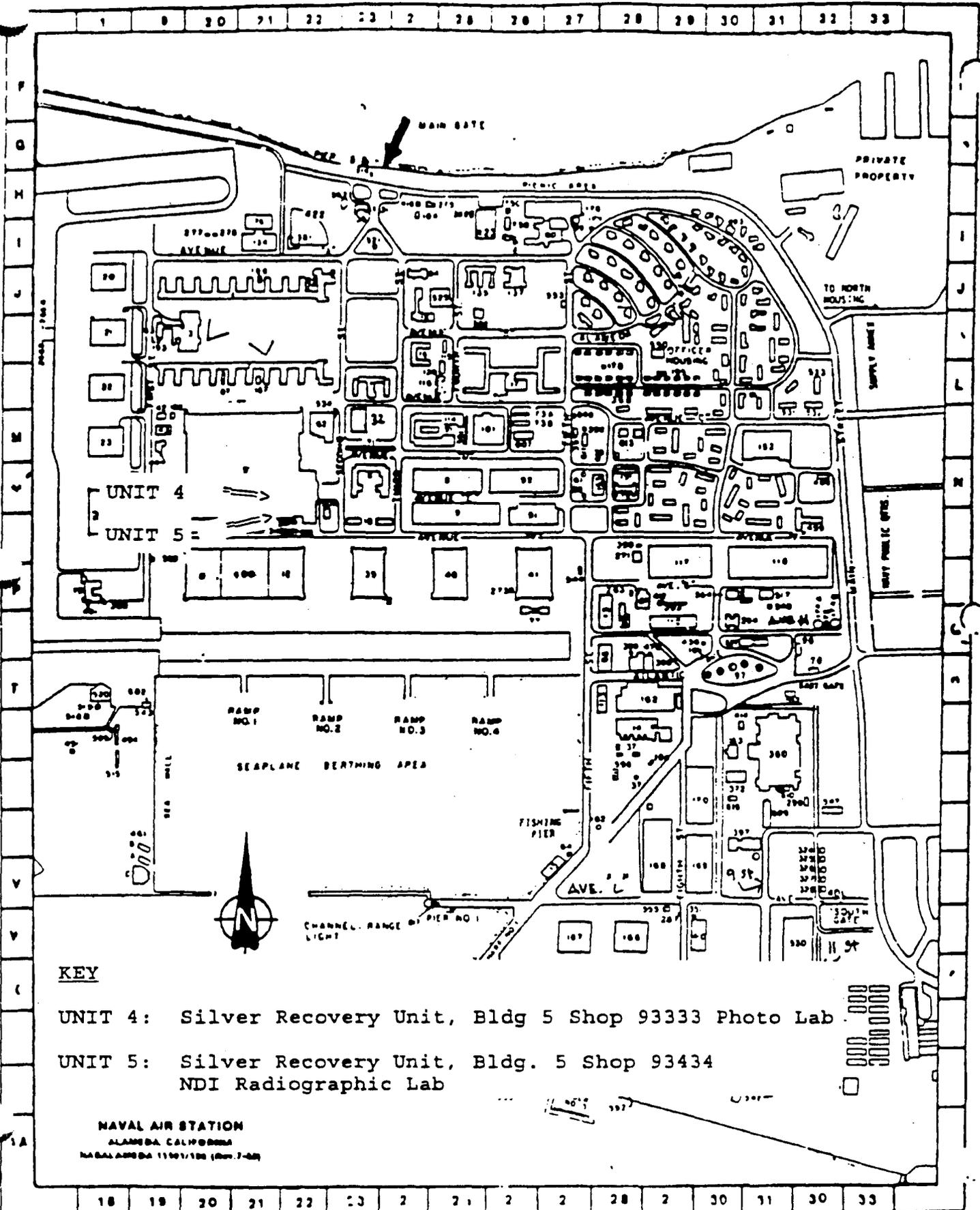
**KEY**

UNIT 1: AIMD Silver Recovery Unit, Hangar 41

UNIT 2: Silver Recovery Unit, Bldg. 16 Branch Medical Clinic

UNIT 3: Silver Recovery Unit, Bldg. 400 Shop 94421 Graphic Arts

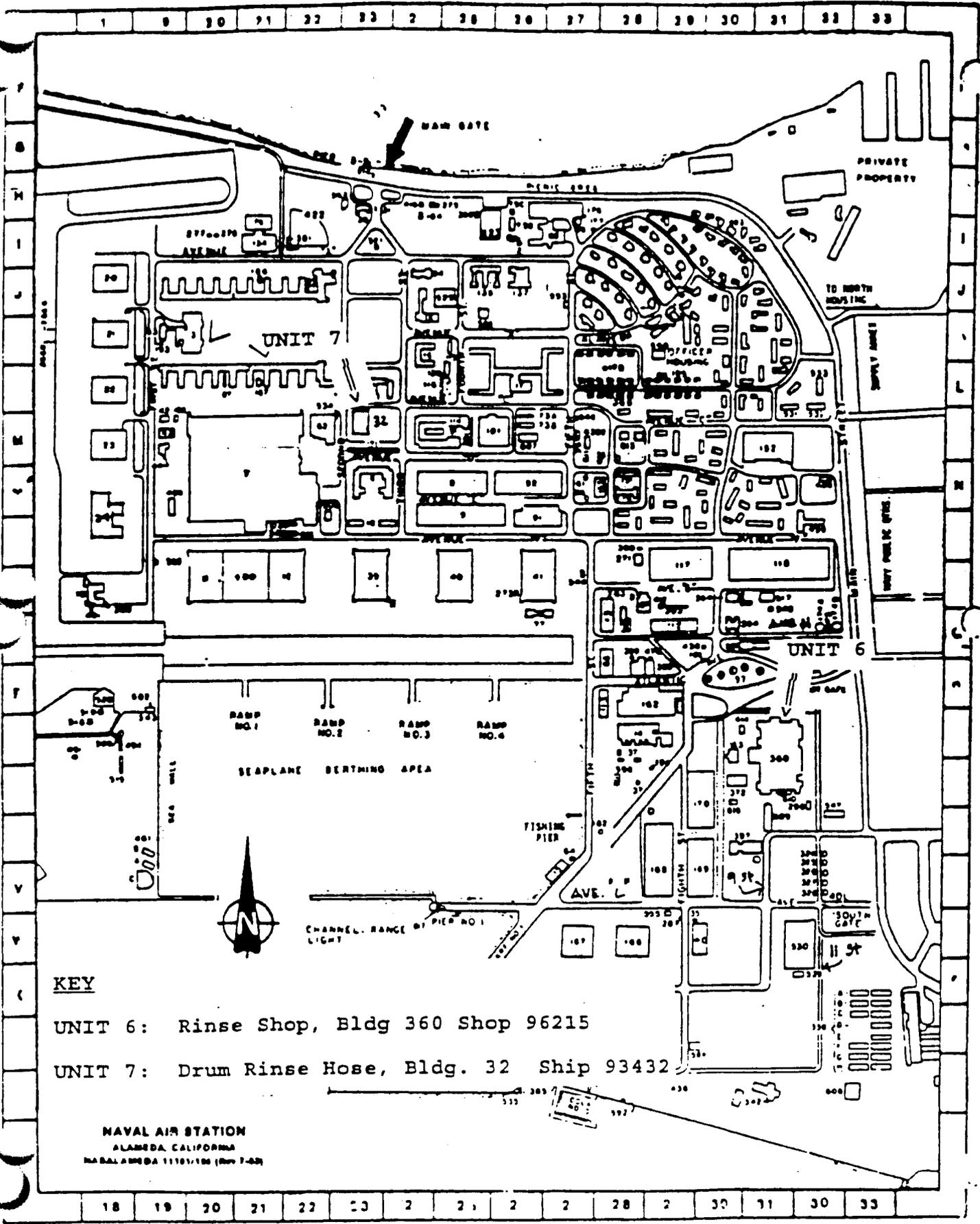
NAVAL AIR STATION  
 ALAMEDA, CALIFORNIA  
 NAVAL AERONAUTICS DIVISION (NAVAER) 11161/100 (Rev. 7-58)



**KEY**

- UNIT 4: Silver Recovery Unit, Bldg 5 Shop 93333 Photo Lab
- UNIT 5: Silver Recovery Unit, Bldg. 5 Shop 93434  
NDI Radiographic Lab

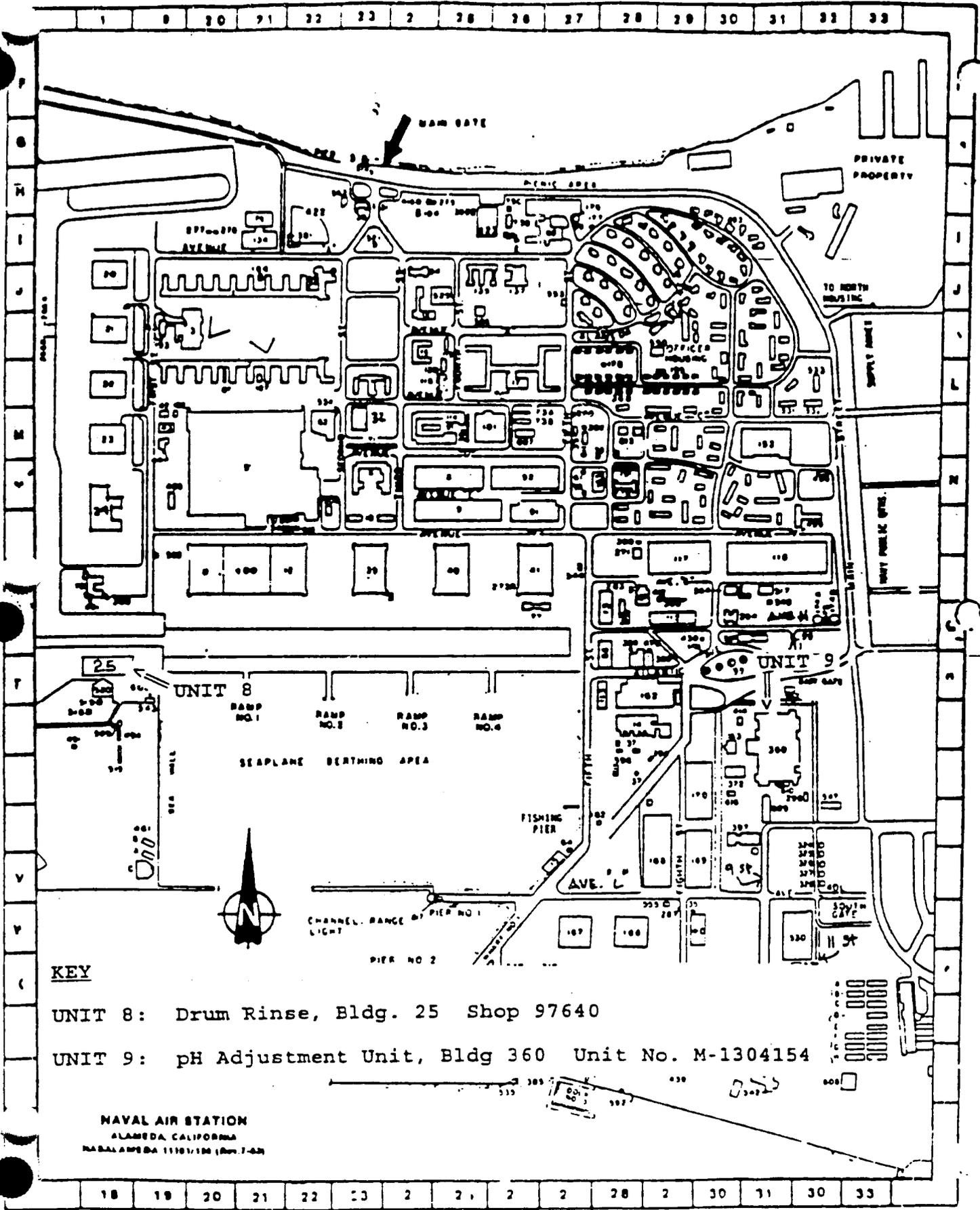
**NAVAL AIR STATION**  
 ALAMEDA, CALIFORNIA  
 NASALAMEDA 11501/100 (Rev. 7-68)



**KEY**

- UNIT 6: Rinse Shop, Bldg 360 Shop 96215
- UNIT 7: Drum Rinse Hose, Bldg. 32 Ship 93432

**NAVAL AIR STATION**  
 ALAMEDA, CALIFORNIA  
 NA BAL ALAMEDA 11151/100 (Rev 7-62)



**KEY**

UNIT 8: Drum Rinse, Bldg. 25 Shop 97640

UNIT 9: pH Adjustment Unit, Bldg 360 Unit No. M-1304154

NAVAL AIR STATION  
ALAMEDA, CALIFORNIA  
NABALAMPEA 11101150 (Rev. 7-62)

N00236.001842  
ALAMEDA POINT  
SSIC NO. 5090.3

LETTER TO DTSC FILING FOR PERMANENT  
CLOSURE OF BUILDING 360 PH  
ADJUSTMENT UNIT

DATED 01 APRIL 1997



DEPARTMENT OF THE NAVY

NAVAL AIR STATION  
250 MALL SQUARE  
ALAMEDA, CALIFORNIA 94501-5000

IN REPLY REFER TO:  
5090  
Ser 015/X119  
1 April, 1997

Department of Toxic Substances Control  
400 P Street, Fourth Floor  
Sacramento, California 95812-0806  
Attn: Mr. Frank Dellechaie

Dear Mr. Dellechaie:

The Naval Air Station (NAS) Alameda is filing for permanent closure of the Building 360 Permit By Rule pH Adjustment Unit No. M-1304154. We are submitting this information to your office as discussed in a telephone conversation between R. Cate, NAS Alameda Code 0151 and Mr. Dellechaie of the Department of Toxic Substances Control of March 3, 1997. We are submitting the Closure Summary Report as enclosure (1). This report includes a discussion of the work performed and analytical results obtained from four soil borings as enclosure (1). A certification for the Closure Summary Report is provided as enclosure (2).

The analytical results indicated that a number of contaminants from Sample Number EB-1-6 had concentrations higher than Preliminary Remediation Goals (PRGs). These contaminants were: Bromodichloromethane, chlorobenzene, 1,1-dichloroethene, perchloroethylene, trichloroethylene, benzo(a)pyrene, benzo(b)fluoranthene, chrysene, dibenzo(a,h)anthracene, and naphthalene. These same contaminants were also found during the subsurface investigation for the Installation Restoration (IR) program at Building 360. The pH adjustment unit did not treat wastestreams containing chlorinated hydrocarbons or other toxic organics. Therefore, we conclude that the presence of these contaminants did not come from the pH adjustment unit itself, but from the industrial processes formerly performed in Building 360.

Currently, a remedial treatability study is underway for IR Site 4 which also covers areas under Building 360. The study is scheduled for completion in February 1998. The California Department of Toxic Substances Control Site Mitigation Unit in Berkeley is overseeing the cleanup of the IR program.

The NAS Alameda point of contact is Randy Cate, Code 0151, at  
(510) 263-3706 extension 13.

Sincerely,



F. J. DODGE  
Captain, U.S. Navy  
Commanding Officer

Encl.

- (1) Closure Summary Report For Building 360 pH Adjustment Unit
- (2) Certification For Building 360 pH Adjustment Unit Closure  
Summary Report

Copy to:  
Engineering Field Activity West (Code 18314)  
San Bruno, California

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Tetra Tech EM Inc., 10670 White Rock Road, #100, Rancho Cordova, CA 95670  
Phone: (916) 852-8300 Fax: (916) 852-0307

June 9, 2004

Mr. Mohinder Sandhu  
Chief  
Standardized Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
California Environmental Protection Agency  
8800 Cal Center Drive  
Sacramento, CA 95826

**Subject: Replacement Pages for  
Current Status of Regulated RCRA Units  
Hazardous Waste Facility Permit CA2170023236  
Naval Air Station, Alameda, California  
(Now Known As Alameda Point)  
Alameda, California  
Contract Number N68711-00-D-0005, Delivery Order 0033**

Dear Mr. Sandhu:

Enclosed are three replacement pages for the document titled "Current Status of Regulated RCRA Units" at Alameda Point dated June 2, 2004.

These three replacement pages should replace the first three pages after Tab 11. The replacement pages are the signed version of the existing letter from DTSC concerning the amendment of the closure plan for industrial wastewater treatment plant 360.

If you have any questions, please call me at (916) 853-4561.

Sincerely,

A handwritten signature in cursive script that reads "Glynis Foulk".

Glynis Foulk  
Project Manager

Enclosure (1)

DS.A033.13690



Tetra Tech EM Inc., 10670 White Rock Road, #100, Rancho Cordova, CA 95670  
Phone: (916) 852-8300 Fax: (916) 852-0307

Mr. Dean Wright, R.G.  
Standardized Permits and Corrective  
Action Branch  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, CA 95826

Mr. Sal Ciriello, Section Chief  
Standardized Permits and Corrective  
Action Branch  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2737

Mr. Dan Murphy  
Office of Military Facilities and  
Mitigation Branch  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2737

Ms. Anna-Marie Cook  
US Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

Ms. Marcia Liao  
Office of Military Facilities and  
Mitigation Branch  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2737

Ms. Elizabeth Johnson  
950 W. Mall Square, Building 1  
Alameda Point  
Alameda, CA 94501-7552

Mr. Lou Ocampo, w/ 2 copies  
Navy BRAC Operations Office  
NAVFAC, EFDSW  
1230 Columbia Street  
San Diego, CA 92101

Mr. Thomas Machiarella  
Navy BRAC Operations Office  
NAVFAC, EFDSW  
1230 Columbia Street  
San Diego, CA 92101

Ms. Diane Silva, w/ 3 copies  
Regulated Units  
Navy Admin Records  
NAVFAC, EDFS  
1220 Pacific Highway  
San Diego, CA 92132

Mr. Doug Delong  
Navy Caretaker Office  
410 Palm Avenue, Building 1, Suite 161  
San Francisco, CA 94030-1806



TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N68711-00-D-0005

Document Control No. TC.A033.10226

TO: Mr. Ron Fuller, Code 02R1.RF
Contracting Officer
Naval Facilities Engineering Command
Southwest Division
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8517

DATE: 05/17/04
DO: 033
LOCATION: Alameda Point, Alameda, California

FROM: Michael Wanta, Contract Manager

DOCUMENT TITLE AND DATE:

Current Status of Regulated RCRA Units Hazardous Waste Facility Permit CA 2170023236

Naval Air Station, Alameda, California (Now Known As Alameda Point), Alameda, California

June 2, 2004

TYPE: Contractual Deliverable (checkbox), Technical Deliverable (DS) (checkbox), Other (TC) (checked)

VERSION: NA REVISION #: NA
(e.g., Draft, Draft Final, Final)

ADMIN RECORD: Yes (checked) No (checkbox) CATEGORY: Confidential (checkbox)

SCHEDULED DELIVERY DATE: 06/03/04 ACTUAL DELIVERY DATE: 06/03/04

NUMBER OF COPIES SUBMITTED TO NAVY: 0/8C/7E
O = original transmittal form
C = copy of transmittal form
E = enclosure

COPIES TO: (Include Name, Navy Mail Code, and Number of Copies)

Table with 3 columns: NAVY, TETRA TECH, OTHER. Lists recipients like Lou Ocampo, Thomas Machiarella, J. Howell - Payne, Terry Martin, Diane Silva, Doug DeLong with their respective copy counts.

Date/Time Received