

Department of Toxic Substances Control



Winston H. Hickox
Secretary for
Environmental
Protection

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

Gray Davis
Governor

September 26, 2003

Ms. Debbi Potter
Base Reuse and Redevelopment Manager
City of Alameda
950 West Mall Square
Alameda, CA 94501-7552

Mr. Mike McClelland
BRAC Environmental Coordinator
Department of Navy
Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

REUSE OF DREDGED MATERIALS FROM SEAPLANE LAGOON AS
FOUNDATION LAYER FOR THE LANDFILL CAP, ALAMEDA POINT,
ALAMEDA, CALIFORNIA

Dear Ms. Potter and Mr. McClelland:

This is in reference to the proposal the City of Alameda (City) presented in the public workshop on September 9, 2001 regarding the reuse of dredged materials from seaplane lagoon. It is our understanding that a recently released EPA-funded study commissioned by the City advocated the use of lagoon materials as the foundation for the cap proposed for the 1943-1956 landfill area at the Northwest Territory.

Please be advised that the seaplane lagoon (IR 17) and the 1943-1956 landfill (IR 1) are both Solid Waste Management Units (SWMUs) identified in the Hazardous Waste Facility Permit issued to Naval Air Station (NAS) Alameda in July 1993. The cleanup of these two units need to follow both the National Contingency Plan (NCP) and the corrective action provisions as codified in Code of Federal Regulations, Title 40 (40 CFR) Section 264.101 and conform to California Health and Safety Code (HSC) Chapters 6.8 and 6.5. Specifically, the incorporation of seaplane lagoon dredge spoil into the landfill cap will require the designation of corrective action management units (CAMUs) and subsequent



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compliance with the relevant design, operating, treatment and closure standards for CAMUs as set forth in 40 CFR Section 264.552.

CAMU, as defined in 40 CFR 260.10, is an area within a facility that is used for managing remediation wastes for implementing cleanup at the facility. It allows the consolidation of remediation wastes without triggering land disposal restriction (LDR) and minimum technology requirements (MTR) and is intended by USEPA to expedite protective and cost-effective remedies at remediation sites. Wastes eligible for CAMU include all solid and hazardous wastes and all media (e.g. sediments) and debris that are managed for the purpose of implementing site cleanup. Although initially CAMU was intended for the specific purpose of managing remediation waste that has been generated as part of a RCRA corrective action program, it was later broadened to include facilities that undergo remediation as a result of CERCLA response action or other permit requirements.

Listed below for your reference are some relevant CAMU regulations:

- 40 CFR 260.10
- 40 CFR 264.550 – 264.553
- 58 FR 8658, February 16, 1993
- 63 FR 65874, November 30, 1998
- 67 FR 2962, January 22, 2002

Please feel free to call me at (510) 540-3767 should you have any questions.

Sincerely,



Marcia Liao, Ph.D., CHMM
Hazardous Substances Engineer
Office of Military Facilities

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cc: Andrew Dick, SWDiv
Richard Weissenborn, SWDiv
Michael Pound, SWDiv
Anna-Marie Cook, EPA
Mark Ripperda, EPA
Judy Huang, RWQCB
Dean Wright, DTSC
Elizabeth Johnson, City of Alameda
Peter Russel, Northgate Environmental
Randolph Brandt, LFR
Burt Morgan, RAB Co-Chair
Lea Loizos, Arc Ecology