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Ser 1146/BAAQMD  
12 AUG 1988

Mr. Tom Brennen  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94106

Subj: THE SOLID WASTE AIR QUALITY ASSESSMENT TEST UNDER THE CALDERON BILL FOR  
NAVAL STATION, TREASURE ISLAND, HUNTERS POINT ANNEX

The purpose of this letter is to confirm the discussions of our June 21, 1988 meeting with you and Mr. Scott Lutz of your office, and our consultant, Harding Lawson Associates (HLA). During that meeting, we obtained clarification of the requirements for the Solid Waste Air Quality Assessment Test (SWAQAT) under California Assembly Bill 3374 (Calderon) as outlined in the Hazardous Waste Disposal Site Testing Guidelines (California Air Resources Board, January 1987).

According to the information received during the June 21, 1988 meeting, any area at Naval Station, Treasure Island, Hunters Point Annex (HPA) that was, has been, is or will be used to dispose of solid, liquid, or semi-liquid waste is subject to the requirements under the Calderon Bill. Four such areas were identified:

1. IR-1, the Industrial Landfill
2. IR-2 and IR-3, the Bay Fill Area and the Oil Reclamation Ponds
3. IR-7, the Subase Area
4. PA-12 (Triple A Site 4) where trenches were allegedly excavated

In accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Contingency Plan (NCP), we will comply with the substantive Calderon Bill requirements as Applicable or Relevant and Appropriate Requirements (ARARs) under our ongoing Remedial Investigation and Feasibility Study (RI/FS) at HPA. We will prepare an addendum to our RI/FS Air Sampling Plan to obtain the following information specified by you during the June 21, 1988 meeting:

- a. Results of testing for subsurface gas migration beyond the solid waste disposal site perimeter (perimeter monitoring).
- b. Results of chemical characterization tests to determine the composition of the gas streams within and immediately above the waste disposal site (internal gas characterization wells and integrated surface sampling, respectively).

N/B 26

**Subj: APPLICABLE AND RELEVANT OR APPROPRIATE REQUIREMENTS OF THE SOLID WASTE  
AIR QUALITY ASSESSMENT TEST**

- c. Results of testing and analysis for hazardous constituents in the ambient air adjacent to the site (ambient air monitoring and associated meteorological data).

We plan to submit the draft addendum to the Air Sampling Plan for review by your District as well as other interested agencies by September 1988. The draft addendum will serve as our SWAQAT proposal and will consist of a description of monitoring points, the design of the sampling systems, and the anticipated monitoring schedule. A report based on the addendum sampling will be prepared and submitted as an interim report to our Air Sampling Plan and will serve as the SWAQAT report. The report will contain information on monitoring activities, field data, analytical results, and conclusions.

Questions regarding this matter can be directed to Commander, Western Division, Naval Facilities Engineering Command (Attn: Mr. Alex E. Dong, Code 1146, (415) 877-7502).

Sincerely,

L. M. SMITH  
CAPTAIN, CEC, USN  
ACTING VICE COMMANDER

Copy to:

Department of Health Services (Attn: Mr. Dwight Hoenig)  
U.S. Environmental Protection Agency (Attn: Mr. Jerry Clifford)  
Regional Water Quality Control Board (Attn: Mr. Steve Ritchie)  
California Department of Fish & Game (Attn: Mr. Mike Rugg)  
U.S. Fish and Wildlife Service (Attn: Mr. Don Palawski)  
National Oceanic & Atmospheric Administration (Attn: Ms. Sharon Christopherson)  
City and County of San Francisco (Attn: Mr. David Wells)  
San Francisco District Attorney (Attn: Mr. Steve Castleman)

Blind copy to:

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Harding Lawson Associates (Attn: Lisa Teague)  
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