



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
1455 FRAZEE RD, SUITE 900
SAN DIEGO, CA 92108-4310

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Ser BPMOW.rfp/0063
FEB 25 2014

Ms. Janet Naito
California Environmental Protection Agency
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, California 94710

Dear Ms. Naito:

SUBJECT: IDENTIFICATION OF STATE "APPLICABLE" OR "RELEVANT AND APPROPRIATE" REQUIREMENTS (ARARs) FOR THE FEASIBILITY STUDY (FS) ADDENDUM AT THE INSTALLATION RESTORATION SITE 17 (IR17) AND BUILDING 503 AREA AT FORMER MARE ISLAND NAVAL SHIPYARD, VALLEJO, CALIFORNIA

Naval Facilities Engineering Command Headquarters (NAVFAC HQ), Base Realignment and Closure (BRAC) Program Management Office (PMO) West is hereby requesting the Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (Water Board), as representatives of the State of California, update potential state chemical-specific, location-specific, and action-specific ARARs for the IR17 and Building 503 Area at Former Mare Island Naval Shipyard, Vallejo, California. ARARs were most recently identified by the State in a letter dated February 12, 2009. ARARs identified by the State will be considered and evaluated during the preparation of the FS Addendum for the IR17 and Building 503 Area under the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

The Final RI Report for the IR17 and Building 503 Area, dated January 27, 2006; the Final Field Summary Report and Vapor Intrusion Risk Evaluation, dated May 22, 2009; the Final Post-Removal Groundwater Well Installation and Monitoring Report, dated August 16, 2012; and the Final Investigation Report, Upland Chlorinated Solvents Investigation, dated June 7, 2013 contain comprehensive site characterization data, which will support your identification of chemical-specific and location-specific state ARARs.

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In addition, the following information is being provided to aid the State in its identification of potential action-specific ARARs. The following response actions are being evaluated alone and/or in combination in the FS Addendum for the IR17 and Building 503 Area:

- No Action
- Engineering Controls
- Institutional Controls
- Covers
- Vapor Barriers
- Sub-Slab Passive Ventilation
- Sub-Slab Depressurization
- Excavation and Off-Site Disposal
- Monitored Natural Attenuation
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The State of California may also identify any other criteria, advisories, guidance, and proposed standards that the State would like to be considered (TBC) for the IR17 and Building 503 Area and the remedial alternatives being evaluated.

Under CERCLA § 121(d)(2)(A) and the National Contingency Plan (NCP) at 40 CFR §§300.400(g) and 300.515(d) and (h), timely identification of potential state ARARs is required. To ensure timely and complete ARARs identification, please include the following information in your response to this request:

1. A specific citation to the statutory or regulatory provision(s) for the potential state ARAR and the date of enactment or promulgation.
2. A brief description of why the potential state ARAR is applicable or relevant and appropriate to the particular IRP site.
3. A description of how the potential state ARAR would apply to potential remedial action, including: specific numeric discharge, effluent, or emission limitations; hazardous substance/constituent action or cleanup levels; etc., if the State intends to take the position that the potential state ARAR includes such limitations, etc.

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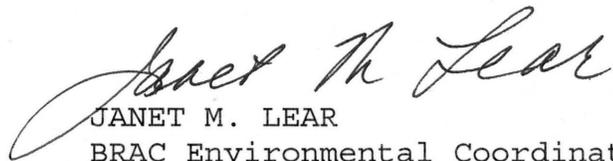
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4. If the State believes its potential ARAR is more stringent than the corresponding Federal ARAR, please provide the rationale and technical justification for this position.
5. If the State determines that there is not enough information to fully respond to this request, please identify any additional information that would be required to support identification of State ARARs and their application.

Consistent with 40 CFR §300.515(h)(2), we are requesting that you send a response via first class mail addressed to me and postmarked within 30 calendar days of receipt of this request. Please direct any technical questions that you may have concerning this request to Mr. Reginald Paulding at (619) 532-0943 or you can contact me at (619) 532-0976. Please contact Mr. Edward Balsamo at (619) 532-0910 with any legal questions.

Sincerely,



JANET M. LEAR
BRAC Environmental Coordinator
By direction of the Director