



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

27 August 2001

Ms. Andrea Muckerman
BRAC Environmental Coordinator
Southwest Division
Naval Facilities Engineering Command
BRAC Operations Office
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8517

Mr. Wilson Doctor
Remedial Project Manager
Southwest Division
Naval Facilities Engineering Command
BRAC Operations Office
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8517

Subject: Site 22 draft Record of Decision Response to Comments

Dear Ms. Muckerman and Mr. Doctor:

This letter is in response to Ms. Muckerman's email of August 24th in which you requested a formal response to the Navy's response to comments (RTC) on the Site 22 Landfill draft Record of Decision (ROD). The U.S. Environmental Protection Agency (EPA) has sent both formal and informal comments regarding the draft ROD and the Navy's RTC.

Overall, the Navy has done an excellent job in addressing our concerns regarding the ROD. Most of the responses to our comments provide the clarification we sought. A few of the responses could be strengthened, as stated in our August 15th informal memo to Mr. Doctor. Specifically, we recommend the following additions.

General Comment 4. In the expanded explanation of the detection monitoring plan, please include a time line for development and implementation of the plan.

General Comment 5. In the expanded explanation of the landfill gas monitoring program, please include a time line for development and implementation of the plan.

General Comment 6. As discussed at the August 9th BCT meeting, the Navy will attempt to get the detection limits for the compounds listed in the tables.

Specific Comment 4. Response doesn't answer comment. Please include a more descriptive list of buried waste.

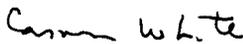
Specific Comment 24. Thank you for the expanded discussion on institutional controls. Please clarify what legally binding document(s) will assure institutional controls remain in place and are enforceable if ownership of site 22 changes in the future.

Specific Comment 29. As stated regarding General Comment 4, please include a time line in the expanded discussion of the monitoring program.

On August 23rd, the Navy and its contractors, EPA and its contractors, and the Regional Water Quality Control Board (RWQCB) held a conference call to clarify the remaining items of concern, i.e., the connection between leachate, ground water, and surface water and the lack of ARARs to protect surface water. As we all agreed during the call, ground water is in communication with landfill material and the resulting leachate can migrate to surface water, albeit slowly. Therefore, compliance with the San Francisco Bay Quality Control Plan is an applicable requirement and should be included in Table 18: *Final State and Federal Action-Specific ARARs for the Selected Remedy*.

Once these issues are resolved, EPA will be in a position to approve the ROD. Please call me at (415) 744-2387 if you wish to discuss further any of these comments.

Sincerely,



Carmen White, EPA
Remedial Project Manager

cc: Adriana Constantinescu, RWQCB
Lynn Suer, RWQCB
Dennis Mishek, RWQCB
Jim Hardwick, CDFG
Jacques Graber, CIWMB
Don Chuck, NASA
Sandra Olliges, NASA
Chris Rummel, Santa Clara Co. Dept. of Env. Health
Laurie Sullivan, NOAA
Hilary Waites, TechLaw, Inc.
Michelle Schutz, EPA
Alana-Lee, EPA.