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

October 12, 2001

Glenna Clark
BRAC Operations, Code 06CA.GC/0718
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

RE: **Draft Project Plans, Soil Removal Actions at IR Sites 5, 14, and 15, Alameda Point, California**

Dear Ms. Clark:

EPA has reviewed the above project plans, prepared by IT Corporation, and submitted by the Navy on July 26, 2001. EPA has reviewed the plans in detail because the Navy has stated that these removal actions are expected to be the final actions for soil removal at these sites. It is important that the removal action and the confirmation sampling are performed and documented in a manner that will support a no further action decision for these sites in the Feasibility Study.

If you have any questions regarding the enclosed comments, please call me at (415) 744-2367.

Sincerely,

Anna-Marie Cook
Remedial Project Manager

enclosure

cc: Michael McClelland, SWDiv
Andrew Dick, SWDiv
Daniel Murphy, DTSC
Dennis Mishek, RWQCB
Karla Brasaemle, TechLaw Inc
Elizabeth Johnson, City of Alameda
Michael John Torrey, RAB Co-Chair

EPA Review of the Draft Project Plans, Soil Removal Actions at IR Sites 5, 14, and 15, Alameda Point, California

GENERAL COMMENTS

1. It is possible that the analytical results from confirmation samples will exceed cleanup levels. This document does not include provisions for additional excavation if the CLEAN contractor sampling results exceed cleanup levels. Please discuss procedures to be followed if the results from confirmation samples exceed cleanup levels.

SPECIFIC COMMENTS

1. **Section 2.3, IR Site 14 - Former Fire Training Area, Page 2-3 and Field Sampling Plan (FSP) Section 2.2, IR Site 14 - Former Fire Training Area, Page 2-2:** The text states that "the containment berm was constructed between 1973 and 1979," but does not discuss when fire training activities began. It is also unclear whether samples have been collected from the original land surface. Please clarify whether fire training was conducted at IR-14 prior to the construction of the berm. Please also discuss whether samples were collected at the former land surface from borings drilled through the berm (i.e., discuss whether samples were collected at the elevation of the former land surface) and analyzed for dioxins.

2. **Section 3.4.2, Building Protection, page 3-2:** The text does not state if it will be necessary for transport trucks to be driven on unpaved areas with contaminated soil. If trucks will be driven in unpaved areas, please discuss measures that will minimize the spread of contamination via dust that could be deposited on paved surfaces from truck tires.

3. **Section 3.4.4, Material Stockpile Areas, page 3-3:** Please provide additional details about stockpiling and staging areas, including whether excavation and/or transport could be conducted during the rainy season. If excavation/transport will be conducted during the rainy season, please discuss provisions for controlling erosion and runoff from the stockpiles. Please specify the length of time that debris and excavated materials will be staged or stockpiled, and discuss whether it will be necessary to stockpile or stage contaminated materials.

   In the Soil Excavation and Removal subsections (Sections 4.3.3, 4.4.2, and 4.5.2) the text states that "contaminated soil will be excavated and containerized." If soil is containerized, stockpiling will not be necessary. Please resolve this discrepancy.

4. **Section 4.1, Permits and Notifications, Page 4-1:** State agencies and USEPA must be notified before field work begins. Section 3.2.2 of the Federal Facilities Agreement requires that USEPA and the state agencies be notified at least 14 days in advance of field work with written notification at least 3 days in advance of field work. Please revise the text to incorporate these necessary notifications.

5. **Section 4.2, Utility Clearances, Page 4-2:** The last sentence in the second paragraph states that "if utilities or other obstructions or hazards are identified at any location" a new location will be surveyed. This does not apply to excavations that are necessary for soil removal. Please revise the text to clearly state the specific locations that can be moved and discuss provisions for handling utilities that intersect areas that must be excavated.

6. **Section 4.3.2, Concrete Demolition and Removal, Page 4-3:** According to the Field Sampling Plan (FSP), concrete will be sampled in stained areas. This procedure should be discussed in this section so that sampling is done prior to demolition. Please discuss concrete sampling procedures and sample preservation in the text and include the concrete samples in Table 1 of the FSP.

7. **Section 4.3.2, Concrete Demolition and Removal, Page 4-3**: The text states that stockpiling requirements are "presented in Section 3.4.4," but Section 3.4.4 does not include any requirements for stockpiling. Please specify the requirements for stockpiling and discuss applicable state and federal regulations. Also, discuss whether concrete will be containerized, or if the intent is to stockpile it.

8. **Section 4.3.4, Waste Profiling Samples, Page 4-3, Section 4.4.3, Waste Profiling Samples, Page 4-5, and Section 4.5.3, Waste Profiling Samples, Page 4-7:** The FSP states that 4 point composite samples will be collected from every 500 cubic yards of soil for disposal profiling. The volume of soil to be excavated from each of these sites is not estimated in the text, so it is unclear whether the number of waste profiling samples proposed for each site is adequate. Please calculate and specify the estimated volume of soil for disposal at each IR Site and discuss whether the proposed number of composite samples are sufficient to adequately profile the waste for disposal.

9. **Section 4.3.4, Waste Profiling Samples, Page 4-3:** Cyanide is a chemical of concern at IR Site 5, but the list of analytes does not include cyanide. Please add cyanide to the list of analytes and methods for IR Site 5.

10. **Section 4.3.6, Backfilling and Compaction, Page 4-4:** Please note that for no further action for soils at IR Site 5, the analytical results and detection limits from confirmation samples must not exceed the remedial action objective cleanup levels in the Feasibility Study.

11. **Section 4.3.6, Backfilling and Compaction, Page 4-4:** Compaction is not discussed in this section. Please discuss whether gravel will be placed in lifts and then compacted or if all of the gravel will be placed before compaction. Please discuss why a separation layer is necessary. Also, please specify whether gravel will be placed directly on the geofabric or if a layer of sand will be placed on the geofabric to minimize the potential for damage from the gravel.

12. **Section 4.4.3, Waste Profiling Samples, Page 4-5:** The analyte list does not include dioxins, which is the contaminant of concern at IR Site 14. Please add dioxins to the list of analyses for IR Site 14.

13. **Section 4.4.5, Backfilling and Compaction, Page 4-5:** Please specify potential sources of "clean fill" and discuss the types of certification that are acceptable.

14. **Section 4.6, Soil Dewatering, Page 4-7:** Please note that USEPA, state and local agencies must be contacted if dewatering is necessary. Discharge permits will be necessary. Waste water that is generated must be tested and meet applicable regulations like the discharge requirements of the local publically owned treatment works before it can be discharged. Please revise the text to discuss applicable regulations, testing and notifications for potential dewatering.

15. **Section 4.7, Transportation and Disposal, Page 4-8:** Please add a statement that all Department of Transportation regulations will be complied with. Also, please list the Class 1 and Class 2 disposal facilities that are being considered and discuss whether they will comply with the CERCLA off-site rule.

16. **Section 4.8, Investigation-Derived Waste Handling, Page 4-8:** Please provide specifics regarding the disposal of investigation-derived waste materials. Also, the reference to excavated soil is vague and this issue has already been covered in more detail in the Waste Profiling and Transportation and Disposal sections. Please explain the reference to excavated soil or remove it.

17. **Section 4.9, Decontamination of Equipment, Page 4-8:** The text states that "rinsate from decontamination activities shall be collected and used to control dust on excavation stockpiles." However, the text in sections 4.3.3, 4.4.2, and 4.5.2 states that soil will be containerized, not stockpiled. Please resolve this discrepancy.

    The FSP states that "waste water will be generated from equipment decontamination...All waste water will be stored in...55 gallon drums or polytanks." This text implies that decontamination water will not be used for dust control. Please resolve this discrepancy. Also, please note that if decontamination water is used for dust control, it can only be used on soil that will be disposed of off-site, stockpiles must be placed on plastic so that infiltration through the stockpiles cannot contaminate soil beneath the stockpiles,

applicable state regulations must be compiled with, and sample collection for waste profiling must be done after all decontamination and dust control activities are complete so the samples are representative of the soil at the time of disposal. Decontamination water cannot be used for dust control after waste profiling samples are collected. Please add these requirements to the text and discuss how soil washed from the vehicles and equipment during decontamination will be handled.

18. **Section 4.13, Postconstruction Submittals, Page 4-9:** Please specify the sample results that will be included in the report. Please indicate whether the CLEAN contractor's confirmation sample results as well as results from samples collected for waste profiling will be included in the report.

19. **Section 4.13, Postconstruction Submittals, Page 4-9:** The report issued for agency review should be titled "Draft Site Closure Report;" typically, the Navy reviews a "Pre-Draft" report. This report is not a primary document and does not have to be issued as a Draft Final report. Please revise the appropriate proposed report titles.

20. **Section 5.2.1, Regulations and Permits, Page 5-2**: Please include applicable regulations for disposal of waste water and stockpiles.

21. **Section 5.2.2, Protection of Air Resources, Page 5-2:** The text does not specify the source of water to be used for dust control. Please note that only clean, potable water can be used for fugitive dust control on roads, barren areas, and during excavation to minimize the potential for contamination of uncontaminated areas.

22. **FSP, Table1:** Water samples for metals analysis must also be chilled to 4 degrees Centigrade. Please add the cooling requirement to the aqueous metals "Preservative" column.

23. **QAPP Section 3.1, Data Quality Objectives:** The Data Quality Objectives (DQOs) should also address how step out excavations will be done if the analytical results from confirmation samples exceed cleanup levels. Please add step out excavations to the DQOs and identify whether this additional contaminated soil will be segregated from the soil that was excavated previously, for example consider a potential case where step out excavation must be done for different contaminants than the original excavation.