



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

09 September 1996

Ms. Teresa Bernhard  
NAVFACENCOM  
Engineering Field Activity West  
900 Commodore Drive  
San Bruno, CA 94066-2402

- Re: 1. **NAVAL AIR STATION, ALAMEDA, CALIFORNIA, OPERABLE UNIT 4, ECOLOGICAL ASSESSMENT, REVISION 2, DRAFT, VOLUMES I AND II, July 1996**
2. **NAVAL AIR STATION, ALAMEDA, CALIFORNIA, OPERABLE UNIT 4, FOLLOW-ON ECOLOGICAL ASSESSMENT, WORK PLAN/FIELD SAMPLING PLAN, DRAFT, July 1996**

Dear Teresa:

The U.S. Environmental Protection Agency (Agency) has completed its review of the subject document. The Agency's general and specific comments are discussed in the attachment. The following discussion summarizes the Agency's major concerns which are discussed in more detail in the aforementioned attachment.

The introduction to the follow-on work plan and field sampling plan (document 2) should better outline the relationship between it and the previous investigation reported in document 1. In addition, it should be made clear that the various areas of concern to be studied in the follow-on work are at different stages in the investigation process. This point is particularly important because the data quality objectives will, thus, also differ from area to area and additional data may need to be acquired before decisions about the various areas of potential ecological concern can be made.

Should you have any questions regarding the Agency's review comments or require additional information, please contact Barbara M. Smith at (415) 744-2366, or me at (415) 744-2402.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Ricks, Jr.", written in a cursive style.

James A. Ricks, Jr.  
Project Manager

cc: B. Smith (EPA)  
S. Serda (EPA)  
N. Black (EPA)  
T. Lanphar (CAL EPA/DTSC)  
G. Kathuria (CAL EPA/RWQCB)  
D. Rist (CAL EPA/DTSC)  
J. Polisini (CAL EPA/DTSC/OSA)  
S. Edde (NAS Alameda)

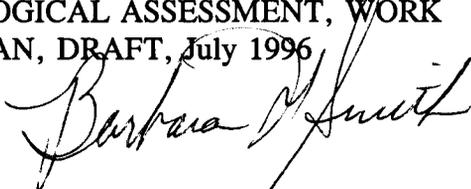
# Attachment One

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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San Francisco, CA 94105

## MEMORANDUM

**SUBJECT:** 1. NAVAL AIR STATION, ALAMEDA, CALIFORNIA, OPERABLE  
UNIT 4, ECOLOGICAL ASSESSMENT, REVISION 2, DRAFT,  
VOLUMES I AND II, July 1996

2. NAVAL AIR STATION, ALAMEDA, CALIFORNIA, OPERABLE  
UNIT 4, FOLLOW-ON ECOLOGICAL ASSESSMENT, WORK  
PLAN/FIELD SAMPLING PLAN, DRAFT, July 1996

**FROM:** BARBARA M. SMITH, Ph.D. 

**TO:** JAMES RICKS, RPM

**DATE:** SEPTEMBER 4, 1996

The above documents include a re-written report of the previous sampling and analyses of sediments from around Naval Air Station (NAS) Alameda performed in the late 1980's (document 1) and proposed follow-on investigation of sediments (document 2). It was recommended at a project meeting held at the offices of the Department of Toxic Substances Control (DTSC) on September 3, 1996, that the Navy address additional comments to document 1 in the form of a list of errata, to be identified as Volume III. This recommendation was made because no new data will be taken, nor additional analysis of existing data performed, for this document. By providing the list of errata, the need for additional resources for re-writing and reproducing the document would be eliminated.

In discussion among the Navy and agencies at the September 3, 1996 meeting, it became clear that there needs to be a more obvious connection between the revisions to the original sediment investigation (document 1) and the on-going ecological assessment at NAS Alameda. The introduction to the follow-on work plan and field sampling plan (WP/FSAP) should better outline the relationship between the WP/FSAP and the previous investigation reported in document 1. In addition, it should be made clear that the various "sites" or areas to be studied under this WP/FSAP are in various stages of investigation. For example, the Seaplane Lagoon (Site 17) is in the Feasibility Study stage, while Breakwater Beach and the Runway Wetland are closer to an initial or Preliminary Assessment stage of investigation. It is for this reason that the data quality objectives for the various "sites" or areas of concern differ and, therefore, there is an expectation that for some of these areas of concern, additional investigation may be necessary before decisions may be made about remedy.

The following comments were presented, orally, to the Navy:

1. Throughout the WP/FSAP, references to "deep" sediments should be changed to "subsurface".
2. Throughout the WP/FSAP, depths of 6 inches should be changed to 10 centimeters.
3. Section 1.2.6, p. 1-7: In the discussion of the factors that influence the movement of sediment in the vicinity of NAS Alameda, density-driven bottom currents are one of several potential factors, including wind-driven waves, that may affect the distribution of sediments.
4. Section 4.1.3: It is unclear how "excess" sediment from cores will be disposed. Please state how material not suitable for compositing will be handled.
5. Section 4.1.5: The text should explicitly state that sediments will be composited by the field team on the barge before shipping to the laboratory for testing.
6. Sections 4.1.6 and 4.3.3: Please add a statement to these sections that, in the event that insufficient tissue is available for all chemical analyses to be performed, that the agencies will be consulted with respect to what the priorities for analyses would be.
7. Sections 4.2.2 and 5.3: It is unclear from the text whether samples containing lead shot will be sieved prior to or after laboratory analysis for lead. Please clarify that sediment containing lead pellets will be sieved prior to analysis for total lead and that lead pellets will be counted and weighed.
8. Section 5.7, p. 5-6: Please modify the text to read: "It is hypothesized that metals will displace iron..."
9. Section 8.4, p. 8-4: Please modify the text to read: "If significant contamination is detected, as determined by screening against ER-Ls... then the Navy may evaluate the area under a feasibility study."
10. Section 10.1, p. 10-2: Please modify the text to read: "PRC will then segregate any such soil cuttings or sediment from other soils or sediments, place them...."