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Cal/EPA

Department of
Toxic Substances
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March 3, 1998

Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Lou Ocampo, Code 1842
900 Commodore Drive
San Bruno, CA 94066-2402

DRAFT PHASE II REMEDIAL INVESTIGATION REPORT, ONSHORE OPERABLE UNIT, FLEET AND INDUSTRIAL SUPPLY CENTER OAKLAND (DECEMBER 1997)

Dear Mr. Ocampo:

The Department of Toxic Substances Control (DTSC), in conjunction with the San Francisco Bay Regional Water Quality Control Board (Regional Board), has reviewed the Draft Phase II Remedial Investigation Report, Onshore Operable Unit, for Fleet and Industrial Supply Center Oakland, dated December 1997.

This report is well organized, and documents in a clear and thorough manner the Navy's efforts to identify sources of organic and inorganic contamination, characterize the nature and extent of any releases from those sources, and comprehensively evaluate the physical conditions at FISCO. However, the Navy has not completed a residential risk assessment, relying on the presumption that the land use will remain industrial. The NCP requires that the Remedial Investigation include a site-specific baseline risk assessment to characterize the current and potential threats to human health and the environment, the results of which will help establish acceptable exposure levels for use in developing remedial alternatives in the Feasibility Study. It is premature to eliminate the residential scenario in the RI.

Specific comments are enclosed. If you have any questions regarding this letter, please contact me at (510)540-3814.

Sincerely,

Mary Rose Cassa

Mary Rose Cassa, R.G.
Engineering Geologist
Office of Military Facilities

enclosure

cc: Mr. Joseph Chou
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Regional Water Quality Control Board
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cc: admin rec (3 copies)
TEMI

3-6-98

DEPARTMENT OF TOXIC SUBSTANCES CONTROL COMMENTS:
DRAFT PHASE II REMEDIAL INVESTIGATION REPORT, ONSHORE OPERABLE UNIT, FLEET AND INDUSTRIAL SUPPLY CENTER OAKLAND (DECEMBER 1997)

General Comments

1. The Navy has not completed a residential risk assessment, relying on the presumption that the land use will remain industrial. CERCLA and the NCP require that the Remedial Investigation include a site-specific baseline risk assessment to characterize the current and potential threats to human health and the environment, the results of which will help establish acceptable exposure levels for use in developing remedial alternatives in the Feasibility Study. It is premature to eliminate the residential scenario in the RI. Considering the residential exposure also may allow significant portions of the facility to to be designated for unrestricted use, thereby eliminating the need for institutional controls (and associated operation and maintenance costs and future liability) for those areas.

2. DTSC concurrence with the Navy's recommendations is contingent on evaluation of results from recent sampling and analysis at IR-02.

3. The Navy presents convincing evidence that storm drain catch basins are not considered a potential source of ongoing contamination because they were cleaned out as part of a removal action. The BCT needs to ensure that the Navy has an effective program in place for operation and management of the storm drain system until that system is removed from service and replaced by the Port's system.

4. Appendix P, Examination of Beneficial Use of Groundwater does not incorporate recent comments from the Regional Board. DTSC and the Regional Board withhold comment on Appendix P and related issues pending review of the revised version.

Specific Comments

1. Section 2.11, Applicable or Relevant and Appropriate Requirements, page 2-18: Please include the complete

sequence of events regarding identification of State ARARs: DTSC received the Navy's request in early April, 1997. DTSC confirmed that ARARs had been identified previously, and reminded each agency on the Navy's distribution list to respond to the Navy's request. DTSC received ARARs from Department of Fish and Game and Bay Area Air Quality Management District in May, and forwarded this information to the Navy at that time. In June, DTSC informed the Navy that no additional identification of ARARs was anticipated at that time.

2. Section 3.2.2, Site Geology: Please include a discussion of the so-called "marsh crust" identified by high concentrations of polyaromatic hydrocarbons at depth in the fill. The existence of this previously-existing contamination is important to the characterization of physical and chemical conditions at FISCO.

3. Section 3.3, Site Hydrogeology, page 3-10: The second full paragraph on this page states, "The storm drain system and other subsurface structures may influence the local direction of groundwater flow at FISCO." Please elaborate as to how this influence has been detected and how it manifests itself.

4. Section 3.4.2, On-Site Land Use (Water System): This section states, "Portions of the system were upgraded in the mid-1980s." If possible, please specify the locations or areas that were upgraded.

5. Section 3.4.2, On-Site Land Use: This section discusses the water, sanitary sewer, and storm drain systems. Please include maps to facilitate evaluation of this information.

6. Section 3.4.2, On-Site Land Use (Future Land Use), page 3-19: This section mentions "determining the level of cleanup" and "methodology for evaluating human health risk decisions." It is premature to discuss level of cleanup and decisions in the RI report. Please revise this section to address <u>evaluating</u> level of cleanup and human health risk, not decision-making.

DTSC COMMENTS - ONSHORE OPERABLE UNIT REMEDIAL INVESTIGATION

7. Section 3.4.2, On-Site Land Use (Future Land Use), page 3-20: This section mentions review of available documentation regarding reuse. Please provide a list of relevant documents (or reference Appendix I). The text makes reference to "existing bylaws," but the appropriate word seems to be "laws." Please correct. The text states the property sale was recorded with a "revisionary clause." The proper word is "reversionary." Please correct. Much of the information on pages 3-20 and 3-21 is not directly relevant to the RI. Please consider including as part of Appendix I.

8. Section 4.5, Miscellaneous Basewide Metal Results, page 4-33: This section makes reference to "ambient" metals concentrations, but "ambient" is not defined until Chapter 7. Please revise.

9. Section 4.7.1, Storm Drain Study Background, page 4-35 and 4-36: The dates of sampling do not match the dates shown on the related figures. Please confirm and correct as appropriate.

10. Section 5.5, Inorganic Compounds: Please consider including information about the occurrence of these metals in California and the Bay Area. This comment applies to Section 7.8.1 of the ecological risk assessment, also.

11. Section 6.3.1.3, Potentially Exposed Populations, page 6-12: This section does not address migration of VOCs through semipermeable pavement or cracks in pavement. Although there may be valid reasons why this mechanism was not considered, these reasons should be presented and made explicit.

12. Section 6.3.2, Identification of Exposure Pathways, pages 6-13 and 6-14: This section does not address inhalation of VOCs from groundwater for industrial workers (longer exposure to lower concentrations than construction worker scenario). Although there may be valid reasons why this exposure pathway was not considered, these reasons should be presented and made explicit.

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13. Section 6.5.1.1, Carcinogenic Risks, pages 6-32 and 6-33: This section correctly states that, in general, a potential upper bound excess lifetime cancer risk of $1x10^{-6}$ is the point of departure. However, the decision to make a risk management decision ("action is generally not warranted") when contaminants are present at concentrations that represent a risk between $1x10^{-6}$ and $1x10^{-4}$ must be clearly justified.

14. Section 7.7.2.1, Site-Specific Conditions, page 7-16: The statement, "Chemical concentrations of storm drain water as it discharges to the FISCO Inner and Middle Harbor are also unknown" appears to conflict with Section 7.7.2.3 (Seasonal and Climatic Variations) on page 7-17 which states, "the level of chemical concentrations in storm drain water." Please clarify or correct.

15. Section 9.1.4, Nature and Extent of Contamination - Soil and Groundwater, page 9-5: The text states, ". . . the nature, extent, and concentrations of these metals appear to present an acceptable risk to human health and the environment." It is preferable to compare concentrations of contamination to <u>acceptable exposure levels</u> (language from the NCP) that represent risk in the range of $1x10^{-4}$ or less ($1x10^{-6}$ being the point of departure). This comment applies also to Section 9.2, Recommendations, on page 9-9.

16. Section 9.2, Recommendations, pages 9-8 and 9-9: The fourth bullet addresses "regulatory compliance" issues involving CERCLA, storm water runoff, the IR Program, and pollution prevention program. While DTSC agrees that all of these environmental issues should be thoroughly reviewed (as addressed in the BRAC Cleanup Plan), the intent of the statement is not clear. Please consider rewriting to address environmental issues pertinent to the remedial investigation separate from compliance and BMP issues.

17. Figure 4-3, Area 1 VOC Groundwater Results: The legend states that black wells were not sampled, but data are associated with at least one black well (A1-MW09). Please correct.

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18. Figures 4-9 through 4-12, Area 2 results: Maps for soil and groundwater for Area 2 have different orientations. It would aid evaluation of the data if all related maps had the same orientation. Please revise accordingly.

19. Figure 4-16, VC Detections in Storm Water Quality Sampling Results: Please identify in the legend the red line that appears to be some sort of boundary marker.

20. Figures 7-1 through 7-19: The vertical scale for some of these figures seems inappropriate for the data distribution. Please consider re-plotting the data using more appropriate scales.

21. Appendix E, Climate Data: Typographic error: "oingitude" should be "Longitude."

22. Appendix H, EDR: Please write out EDR. Please label historic maps with the appropriate year of printing.