

**RESPONSE TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S COMMENTS ON  
THE DRAFT SITE 15 REMOVAL ACTION CLOSE-OUT REPORT  
FOR ALAMEDA POINT**

This document presents the Navy's responses to comments from the U.S. Environmental Protection Agency, Region IX, dated September 3, 1998, on the Draft Site 15 Removal Action Close-out Report for Alameda Point, dated July 1998.

**Specific Comments**

**Comment 1:** Overall the report is well written and informative. The Executive Summary is a useful overview and the only area for improvement concerns the discussion at the bottom of page ES-2 dealing with the difficulties of on-site treatment of the contaminated soil. This statement should be explained to make the document complete. One of the biggest problems that occurred with the removal action was that the initially proposed treatment technology did not work out and so a TSTA had to be established. Understanding why the on-site treatment did not work out will make the report more complete and give other people who may be thinking of using on-site treatment for their projects some further information to consider in their decision making process.

**Response:** The Executive Summary has been revised to state that "Due to technical difficulties with the innovative soil washing treatment technology and accommodation of the Army Corps of Engineers' schedule for the sewer line replacement project at Site 15, the soil washing system was not fully implemented and was demobilized."

In addition, under "On-Site Treatment" in Section 4.1.1, revisions have been made to include additional detail as to why the innovative soil washing treatment technology did not perform as expected. Additional information is referenced in International Technology Corporation's (IT) Site 15 Post-Construction Closure Report dated April 1996.

**Comment 2:** Pg 10, Section 3.4: Please add in this section the reasons for the more than 2 year delay between the EE/CA and the addendum to the EE/CA.

**Response:** The Executive Summary and Sections 3.4, 4.1.1, and 4.1.2 have been revised to include details on the problems that occurred during field activities that resulted in delays to the project.

**Comment 3:** Pg 11, Table 1: Please revise the mail code for the EPA RPMs to be SFD 8-2 rather than the listed H-7-5.

**Response:** The text has been revised as requested.

**Comment 4:** Pg 12, Section 4.1: Although the removal action has been completed and the TSTA demolished and the site restored, the Navy should be aware that a small non-compliance issue exists with regard to the RCRA regulations during the period of TSTA operation and maintenance. RCRA regulations allow for construction and

**operation of a TSTA for one year with public notice. A one time extension of up to one year is allowed provided notification and justification are made available to the public if the extension is needed. The TSTA was operated for just under two years; however no notification with accompanying rationale was given for the time period that elapsed after the first year. TSTA's (sic) are useful mechanisms for temporally managing wastes from a remediation site, and it is likely that this mechanism will be used again at Alameda Point. Keeping in mind the necessary public notification will assist in complying with the regulations for these units in the future.**

Response: Comment noted.

**Comment 5: Pg 28, Section regarding "On-Site Treatment": Please elaborate on the technical difficulties encountered. The document will be more complete and others can learn from the experience.**

Response: Under "On-Site Treatment" in Section 4.1.1, revisions have been made to include additional detail as to why the innovative soil washing treatment technology did not perform as expected. Additional information is referenced in IT's Site 15 Post-Construction Closure Report dated April 1996.

**RESPONSE TO THE CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY,  
DEPARTMENT OF TOXIC SUBSTANCES CONTROL'S COMMENTS  
ON THE DRAFT SITE 15 REMOVAL ACTION CLOSEOUT REPORT  
FOR ALAMEDA POINT**

This document presents the Navy's responses to comments from the California Environmental Protection Agency, Department of Toxic Substances Control, dated September 3, 1998, on the Draft Site 15 Removal Action Close-out Report for Alameda Point, dated July 1998.

**Specific Comments**

**Comment 1: Page 18: The text states, "... an additional 1-foot depth of impacted soil was excavated around the sampling point." Please include the distance away from the sampling point that additional excavation extended.**

Response: The additional area of soil excavated is stated on page 18 in the first paragraph of subsection "Confirmation Sampling Results." The text states "Each location was excavated concentrically to half the distance to the surrounding confirmation sampling points."

**Comment 2: Page 18: The text states, "... confirmation soil samples were collected from the stockpile locations." Please include a brief description of the number of samples per soil volume.**

Response: The text refers to confirmation samples collected from the soil beneath the temporary stockpiles that were located within the Site 15 boundary during excavation activities. After the stockpiles were relocated to the TSTA, the areas beneath these stockpiles were sampled in accordance with the confirmation sampling protocols documented in the Site 15 Removal Action Implementation Work Plan dated August 1994. The text has been revised to eliminate confusion.

Sampling frequency for the disposition of the TSTA stockpile soils is documented in International Technology Corporation's Construction Closure Report, Non-Time Critical Removal Action, Site 16-CANS C-2 Area and Site 15 Soil Removal at Temporary Storage and Treatment Area dated March 1998.

**Comment 3: Page 28: Please move the description of the Army Corps of Engineers project ("It was necessary... within the Site 15 boundary.") from Section 4.1.2 to the preceding subsection, "On-Site Treatment."**

Response: The text has been revised as requested.

**Comment 4: Page 28: The text states, "Due to unanticipated site conditions..." Please give one or two examples of the conditions that impacted the project.**

Response: Section 4.1.2 has been revised to include additional details on the problems that occurred during field activities that impacted the project.

**Comment 5: Pages 28-29: Please explain why nearly two years elapsed before the soil in the TSTA was disposed of. This question should be included in the executive summary, as well.**

**Response:** The Executive Summary and Sections 3.4, 4.1.1, and 4.1.2 have been revised to include details on the problems that occurred during field activities that resulted in delays to the project.