

# Arc Ecology

*Environment, Economy, Society, & Peace*

February 22, 2002

Glenna M. Clark  
Department of the Navy  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, CA 92132-5190

Dear Ms. Clark,

I have reviewed the Draft Engineering Evaluation and Cost Analysis for the Non-Time Critical Lead Removal Action at the Water Tower and Antenna Sites, Alameda Point, dated December 21, 2001. I would agree with the recommended removal action alternatives chosen if the following comments are addressed:

1. In section 3.2, page 1 the Navy mentions that verification sampling will be performed to confirm that the goals of the removal action have been accomplished. Please include an explanation of how this testing will be carried out and what the Navy will do when/if results are above the established Navy PRC.
2. Section 4.2.2.2, page 29, "Protection of the Community During Removal Actions": Please provide a clear description of the dust suppression measures that will be taken during excavation, staging and loading. Examples of measures that should be included:
  - Watering all construction areas at least twice daily to prevent dust plumes from leaving the site;
  - Mist or spray water while loading or unloading soil transportation vehicles as needed to prevent dust generation;
  - Minimize drop heights when loading transportation vehicles carrying sand, soil or other loose granular materials;
  - Use tarpaulins or other effective covers for trucks carrying sand, soil, or other loose granular materials;
  - Sweep all paved access routes, parking areas, and staging areas daily if soil is visible;
  - Sweep public streets daily if visible soil material is carried into the street;
3. Section 4.2.2.2, page 30, "Environmental Impacts Resulting from Construction and Implementation": Air monitoring and erosion control measures for stockpiles should also be included and clearly described.

I appreciate the opportunity to comment on this document. If you have any questions regarding my comments, please call me at (415)495-1786.

Sincerely,



Lea Loizos  
Staff Scientist, Arc Ecology

Cc:

Ms. Anna-Marie Cook, U.S. Environmental Protection Agency, Region IX  
Ms. Marsha Liao, Department of Toxic Substances Control  
Mr. Laurent Meillier, San Francisco Bay Regional Water Quality Control Board  
Mr. Dennis Mishek, San Francisco Bay Regional Water Quality Control Board