Department of Toxic Substances Control

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February 20, 2004

Commander, Naval Facilities Engineering Command
Southwest Division
Attn: Mr. Luciano A. Ocampo, P.E.
Remedial Project Manager
1220 Pacific Highway
San Diego, California 92132-5190

APPROVAL OF THE AMENDMENT TO THE INDUSTRIAL WASTE TREATMENT PLANT (IWTP) 360 CLOSURE PLAN (PART I AND II), ALAMEDA NAVAL AIR STATION (ALAMEDA POINT), ALAMEDA, CALIFORNIA, EPA ID # CA 2170023236

Dear Mr. Ocampo:

The Department of Toxic Substances Control (DTSC) has reviewed the final Part I Amendment to the Closure Plan and Part II Sampling and Analysis Plan for IWTP 360, dated January 16, 2004, prepared by Tetra Tech Inc. The Amendment to the Closure Plan outlines the tasks necessary to achieve closure for the unit and the Sampling and Analysis Plan provides the sampling techniques, locations, and analysis necessary to conduct the field work. Part I and Part II of the Amendment to the Closure Plan are approved, however, the Navy must address the comments from DTSC's Human and Ecological Risk Division (HERD) listed below either during the field work or the closure report preparation as appropriate:

1. Please provide an estimate of the total incremental cancer risk and non-cancer hazard under, a residential scenario, for the material remaining at the site in soil and groundwater for consideration by the risk managers. Element-by-element or compound-by-compound elimination of constituents (Part I, Section 5.1.1, page 10) is insufficient information for the risk managers.

2. EPA and/or Department of Health Services (DHS) Maximum Contaminant Levels (MCLs) were used as screening values for groundwater (Part I, Section 6.0, page 13) in the Human Health Risk Assessment (HHRA). These are inadequate for determining risk and/or hazard as they are not risk based and do not include other exposure pathways such as inhalation of indoor air and other exposures to groundwater contaminants. Potential effects on ecological receptors are also not addressed in the event groundwater travels to surface water.

3. EPA Region 9 soil PRGs for residential use were checked and found to be accurate, with several exceptions. The U.S. EPA lists an MCL of 1.1E+02 µg/l for hexavalent chromium in water. OEHHA also has a hexavalent chromium value for water consumption. The table (Section 8.0, page 17) lists 'NA', taken to mean Not Applicable. Please correct the table referenced to include the most current values.

4. The former IWTP treated plating wastewater with sulfuric acid, sulfur dioxide, sodium hydroxide, sodium hypochlorite and a polymer to precipitate the metals (Part I, Section 10.1.1, page 10-2). Given the nature of the fill material used to construct NAS Alameda it would not be unreasonable for these chemicals to leach toxic materials from the fill material if there were a leak in the piping. If results of the initial sampling suggest the piping has leaked, DTSC recommends that a full suite of inorganic elements be assessed in any further sampling.

5. The Project-Required Reporting Limits (PRRLs) (Part II, Table D-1, page D-1) were checked and found to be appropriate for evaluation in the HHRA, even for the widthdrawn California-modified soil cadmium PRG of 1.7 mg/kg rather than the residential soil PRG of 37 mg/kg listed. However, total incremental cancer risk and/or hazard must be presented.

The Navy shall begin the closure field activities at this unit as scheduled. DTSC acknowledges the notice of February 18, 2004 indicating that field work is set to begin on March 3, 2004. Please submit the closure report and certification to DTSC by July 30, 2004.

If you have any questions or comments concerning this letter please contact Mr. Dean Wright of my staff at (916) 255-6528.

Sincerely,

for:
Wei Wei Chui, Section Chief
Standardized Permitting and Corrective Action Branch

cc: Next page

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