



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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ALAMEDA POINT
SSIC NO. 5090.3

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Ser 06CA.LO/0266
March 5, 2004

Ms. Wei Wei Chui
Section Chief
Standardized Permits and Corrective Action Branch
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2721

Dear Ms. Chui:

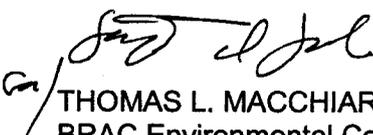
Subj: APPROVAL OF THE AMENDMENT TO THE INDUSTRIAL WASTE TREATMENT
PLANT (IWTP) 360 CLOSURE PLAN (PART I AND II) ALAMEDA NAVAL AIR STATION
(ALAMEDA POINT), ALAMEDA, CALIFORNIA EPA ID # 2170023236

Thank you for your letter of February 20, 2004 forwarding the Department of Toxic Substances Control (DTSC) approval of the Final Amendment to the Closure Plan (Part I) and Sampling and Analysis Plan (Part II) of IWTP 360 dated January 16, 2004, and the DTSC review comments from its Human and Ecological Risk Division (HERD) on the same document.

Enclosure (1) is Navy's response and resolutions to the review comments. We will implement these resolutions during the fieldwork and as requested in your letter, we will also address them in the Closure Report. Our schedule is to submit draft closure report to DTSC by July 2004 and the certification report by May 2005; however, we do our best to submit earlier than the schedule.

Should you have any questions, please contact Mr. Ocampo at (619) 532-0969 or me at (619) 532-0907.

Sincerely,


ca/ THOMAS L. MACCHIARELLA
BRAC Environmental Coordinator
By direction of the Commander

Encl: (1) Navy Response to DTSC comments per letter of Wei Wei Chui of February 20, 2004

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Bill B

NAVY RESPONSE TO COMMENTS DATED FEBRUARY 20, 2004 FROM THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL (DTSC) ON THE REVIEW OF FINAL AMENDMENT TO THE CLOSURE PLAN AND SAMPLING AND ANALYSIS PLAN, INDUSTRIAL WASTE TREATMENT PLANT 360, ALAMEDA POINT (Formerly Naval air Station Alameda) ALAMEDA, CALIFORNIA.

DTSC comments are from Ms. Wei Wei Chui based on comments from James Polisini with HERD.

Comment 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.

Response: The human health risk assessment (HHRA) will be conducted after the sampling proposed in the amendment to the closure plan is completed; the results from the current round of sampling will be included in the HHRA. Total incremental cancer risk and non-cancer hazard will be calculated in the HHRA.

Comment 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.

Response: The HHRA has not yet been conducted; the HHRA will be conducted after the sampling proposed in the amendment to the closure plan is completed – and this evaluation would consider all significant exposure pathways and all likely exposure scenarios. Furthermore, site information will be evaluated to make a determination of any potential ecological risks that could be attributed to contaminants associated with this site – and then, if necessary, the appropriate level of ecological risk assessment will be conducted.

Comment 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.

Navy Response to DTSC comments of Feb 20, 2003

Response: The U.S. EPA lists a preliminary remediation goal (PRG) of 1.10E+02 µg/l for tap water. This value will be included in the IWTP 360 investigation report. The OEHHA public health goal (PHG) for drinking water for chromium was withdrawn in November 2001 and has not been replaced; OEHHA does not currently have a PHG for hexavalent chromium. No change will be made to the Final Part I Amendment to the Closure Plan and Part II Sampling and Analysis Plan for IWTP 360 documents.

Comment 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.

Response: The Navy will analyze the soil and groundwater samples collected under this sampling plan for the full suite of inorganic elements. This change will be reflected in the closure or investigation report as requested by DTSC.

Comment 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 withdrawn 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.

Response: Refer to the response to comment 1.

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

Response: The Navy will submit the Draft IWTP 360 Investigation Report discussing the results of the soil and groundwater sampling and the conclusions of the HHRA and ecological risk assessment to DTSC by July 30, 2004. In accordance with the project schedule in the final amendment to the closure plan, the draft closure certification report will not be available until May 2005. Navy will try to submit the report earlier if possible.