



California Regional Water Quality Control Board

San Francisco Bay Region



Terry Tamminen
Secretary for
Environmental
Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.swrcb.ca.gov/rwqcb2>

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ALAMEDA POINT
SSIC NO. 5090.3

Date: **JUL 01 2004**
File: 2199.9285(JCH)

Mr. Thomas L. Macchiarella
Southwest Division Naval Facilities Engineering Command
Attn: Code 06CA.TM
1220 Pacific Highway
San Diego, CA 92132-5190

Subject: Comments on the Draft Remedial Investigation Report, Sites 3, 4, 11, and 21, Operable Unit 2B, Alameda Point, Alameda, California

Dear Mr. Macchiarella:

The San Francisco Bay Regional Water Quality Control Board (Water Board) staff reviewed the *Draft Remedial Investigation Report, Sites 3, 4, 11, and 21, Operable Unit 2B, Alameda Point, Alameda, California*, dated March 31, 2004 (draft RI). Based on the limited review of soil and groundwater impacts, staff has the following comments:

General Comments:

1. For all four sites, the draft RI used detection limits greater than the previously negotiated preliminary remediation goals (PRGs) for soil, groundwater, and soil gas monitoring. Some of these detection limits were also greater than standard laboratory reporting limits. As a result, many chemicals of concern were reported as "not detected (ND)" and removed from further risk evaluation. This invalidated many risk evaluation conclusions. Please conduct additional data gap sampling using appropriate detection limits.
2. On all sites the aquatic ecological risk assessments were incomplete. The storm sewer bedding material pathways were not evaluated. The draft RI recognized that many of the storm sewers are in contact with groundwater and have breaks and leaks that need to be repaired. Yet the draft RI contained no discussion on the potential for the storm sewer bedding material as a preferential discharge pathway to Sea Plane Lagoon. Please include a discussion of the storm sewer bedding acting as a preferential pathway.
3. For sites where there are direct groundwater discharges into Waters of the State, California Toxics Rule salt water and human health criteria for the consumption of organisms should be used in ecological and human health risk assessment.

Specific Comments:

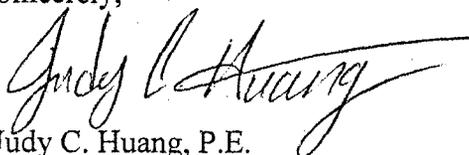
1. Page 5-12, Section 5.3.1 Site 3 Data Assessment - Soil, Fourth Paragraph and Page 8-13, Section 8.3.1 Site 21 Data Assessment - Soil, Fifth Paragraph: Both paragraphs

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state "although minimal data were available for VOCs in soil from 0 to 2 feet bgs, this is not perceived as a data gap because most of the site is paved and VOCs in surface soil likely would volatilize and no longer be present in the soil at the site" Staff agrees with the statement that volatilization of VOCs does occur in non-paved area. However, future use for Site 3 includes commercial/industrial uses that would require the removal of the paved surface. It is important to collect data from the paved area to determine risks for these future uses scenario. Please conduct additional VOC sampling in soil from 0 to 2 feet bgs.

Please contact me at (510) 622-2363 or email jch@rb2.swrcb.ca.gov if you have any questions.

Sincerely,



Judy C. Huang, P.E.
Project Manager

Cc (via US Mail and email):

Ms. Anna-Marie Cook
Project Manager
U.S. EPA Region IX
75 Hawthorne Street, (SFD-8-2)
San Francisco, CA 94105-3901

Ms. Marcia Liao
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Ms. Karla Brasaemle
Tech Law, Inc.
90 New Montgomery St., Suite 1010
San Francisco, CA 94105

Ms. Sophia Serda
U.S. EPA
Region IX
75 Hawthorne Street, (SFD-8-2)
San Francisco, CA 94105-3901

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