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ALAMEDA POINT
SSIC NO. 5090.3

ACTION MEMORANDUM / REMOVAL ACTION WORK PLAN FOR TIME-CRITICAL REMOVAL OF PESTICIDE STORAGE SHED AND DIELDRIN-CONTAMINATED SOIL AT BUILDING 195

ALAMEDA POINT
ALAMEDA, CALIFORNIA

Environmental Remedial Action
Contract Number N62474-98-D-2076
Contract Task Order 0013

Document Control Number 1802
Revision 1

October 3, 2001

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U. S. Department of the Navy
Southwest Division
Naval Facilities Engineering Command
Environmental Division
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San Diego, California 92132-5190

Submitted by:

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ALAMEDA POINT
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REVISION 0

ACTION MEMORANDUM / REMOVAL OF PESTICIDE STORAGE SHED AND DIELDRIN-CONTAMINATED SOIL AT BUILDING 195

DATED 14 AUGUST 2001

IS ENTERED IN THE DATABASE AND FILED AT ADMINISTRATIVE RECORD NO. **N00236.001868**

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Acronyms and Abbreviations

ARAR	Applicable or Relevant and Appropriate Requirement
BCT	Base Realignment and Closure Cleanup Team
bgs	below ground surface
Ca-HSC	California Health and Safety Code
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CLP	Contract Laboratory Program
DON	Department of the Navy
DTSC	California Department of Toxic Substances Control
EBS	Environmental Baseline Survey
EE/CA	Engineering Evaluation/Cost Analysis
EPA	U.S. Environmental Protection Agency
HDPE	high-density polyethylene
mg/kg	milligram(s) per kilogram
Navy	U.S. Department of the Navy
NCP	National Contingency Plan
NPL	National Priorities List
PCB	polychlorinated biphenyl
PRG	Preliminary Remediation Goal
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
TCRA	Time-Critical Removal Action
TPH	total petroleum hydrocarbons

ALAMEDA POINT
(FORMER NAVAL AIR STATION ALAMEDA)
ALAMEDA, CALIFORNIA 94501
OCTOBER 3, 2001

Subject: **Action Memorandum for Removal Action at Alameda Point, Alameda, California -- Parcel 98, Building 195**

Site Status: **NPL**
Category of Removal: **Time-Critical Removal Action**
CERCLIS ID: **CA2170023236**
Site ID: **Parcel 98, Building 195**

1.0 Purpose

The purpose of this Action Memorandum/Removal Action Work Plan is to document, for the Administrative Record, the Department of the Navy's (DON) decision to undertake a Time-Critical Removal Action (TCRA) for the removal and disposal of dieldrin-contaminated soil and dismantling/disposal of a former pesticide storage shed covered with lead-based paint at the subject site. The Department of Defense has the authority to undertake Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) response actions, including removal actions, under 42 U.S.C. §9604, 10 U.S.C. §2705, and federal Executive Order 12580. Further, this removal action is consistent, to the maximum extent possible, with Chapter 6.8 of the California Health and Safety Code (Ca-HSC).

The proposed TCRA includes dismantling and disposing of a former pesticide storage shed covered with lead-based paint and excavating and disposing of soil contaminated with dieldrin within and around this shed. By doing this, the proposed action will substantially eliminate the identified pathways of exposure to hazardous substances and contaminants of concern for human and ecological receptors. This TCRA is anticipated to be a complete cleanup to or below Environmental Protection Agency (EPA) residential preliminary remediation goals (PRGs) of the above-mentioned contaminants.

The proposed Removal Action for this site is deemed consistent with the factors set forth within the National Contingency Plan (NCP) 40 CFR Part 300 and Chapter 6.8, Ca-HSC, based on the findings of levels of contaminants in soils at or near the surface that may migrate and provide actual or potential exposure to nearby human populations or animals.

2.0 Site Conditions and Background

This section presents the site location and description, site characteristics, releases or threatened releases into the environment of a hazardous substance or contaminant, the site's National Priorities List (NPL) status, other actions taken at the site to date, and the role of state and local authorities at the site.

2.1 Removal Site Evaluation

Environmental Baseline Survey (EBS) Parcel 98 (hereinafter referred to as Parcel 98) is located west of Main Street in the northeastern portion of Alameda Point. Approximately 115 buildings occupy this parcel, most of which are primarily used for housing and maintenance operations. Building 195 (pesticide storage shed) is located in the south-central portion of Parcel 98, in a landscape maintenance yard, and served as a storage shed for fertilizers and pesticides.

To support transfer of Alameda Point to the City of Alameda for redevelopment, the Navy initiated the EBS Program in 1993 to evaluate the environmental condition of all property at the facility, including Parcel 98, that was not being investigated under CERCLA. In 1994 and 1995, during the Phase 2A and Phase 2B EBS, surface and subsurface soil samples were collected at Parcel 98 and analyzed for constituents of potential concern based on the parcel's history of use. Results of the EBS Phase 2A analyses indicated the presence of dieldrin in two samples (0.75 mg/kg and 0.089 mg/kg) adjacent to Building 195 exceeding its U.S. EPA Region 9 residential PRG of 0.03 mg/kg; the maximum concentration detected (0.75 mg/kg) was present in a soil sample collected just inside the front door of Building 195 (Final EBS, Alameda Point, June 29, 2001 – Phase 2A, Parcel 98). Step-out soil samples collected to delineate the extent of dieldrin contamination during the Phase 2B EBS were analyzed for dieldrin. Results of the analyses were either non-detect or below the residential PRG for dieldrin, indicating the dieldrin contamination detected during the Phase 2A EBS sampling appeared limited in extent.

In March 2001, during a site visit to gather information for dismantling Building 195 in order to facilitate soil removal activities, the Navy discovered the paint on the building was peeling over most of the structure and proceeded to collect a sample of the paint for analysis of lead. Results of the analysis confirmed the presence of lead in the paint. The Navy discussed these results, and results of the previous EBS sampling which revealed the presence of dieldrin, with the regulatory agencies during the April 17, 2001 Base Realignment and Closure Cleanup Team (BCT) meeting. During the June 16, 2001 BCT meeting, the Navy and regulatory agencies discussed and agreed upon cleanup criteria for dieldrin and lead and, at this time, the planning

period for the removal action began. Considering the dieldrin-contaminated soil, the condition of the painted surface of Building 195, the threatened release of lead to the soil surrounding the building, and the proposed residential reuse of this portion of Parcel 98, the Navy decided, with regulator concurrence, to conduct a time-critical removal action at this location to remove the contaminated soil and dismantle and dispose of the building.

2.2 Physical Location

Building 195 is located within the boundaries of Parcel 98 in the northeastern portion of Alameda Point. Alameda Point, the former Naval Air Station, is located at the western end of Alameda Island. Alameda Island is located on the eastern shore of San Francisco Bay, adjacent to the City of Oakland. Alameda Point occupies approximately 2,634 acres (including contiguous submerged lands), and is approximately 2 miles long by 1 mile wide.

Building 195 is located in the landscape maintenance yard in the south central portion of Parcel 98 (Figure 1). Building 195 was utilized as a storage shed for fertilizers and pesticides. The building is a Quonset Hut design and is constructed of painted corrugated steel with a composite board interior lining and an earthen floor. The building covers an area of approximately 860 square feet. The Building 195 removal area is located within the on-base housing area and approximately one-half mile west of George P. Miller Elementary School and adjacent daycare facility. The Oakland Inner Harbor is located approximately 1,500 feet north of Building 195. The Building 195 removal area is not immediately adjacent to any vulnerable or sensitive populations, habitats, or natural resources.

2.3 Site Characteristics

The Building 195 removal area is located within the landscape maintenance yard which is used for the storage of landscape maintenance equipment. The property is currently under Navy ownership with plans for transfer to the City of Alameda. This is the first removal action planned for this site.

2.4 Release or Threatened Release into the Environment of a Hazardous Substance, Pollutant, or Contaminant

Within the military family housing area, landscaping and lawn maintenance were conducted by military and civilian personnel. Building 195 is located within a landscape maintenance yard in the south-central portion of the family housing area (Parcel 98) and was used as a storage shed for pesticides and fertilizers. Records indicating the pesticides and fertilizers stored in Building 195 and their quantities could not be located. Additionally, the presence of lead-based paint on the exterior surface of Building 195 presents the threatened release of lead to the soil

surrounding the building. The landscape maintenance yard, including Building 195, is enclosed within a chainlink fence. Building 195 is situated in an area within the yard that remains relatively undisturbed. Except for rain, no outside influences appear to be present to accelerate the spread of dieldrin or lead contamination.

Parcel 98 is designated for future use as residential housing. Potential exposure pathways to the lead and dieldrin include direct ingestion, inhalation, and dermal contact.

2.5 National Priorities List

Alameda Point was added to the NPL on July 22, 1999. The listing was the result of a hazard ranking system evaluation performed by the EPA.

2.6 Status Maps, Pictures, and Other Graphic Representations

Location of the Building 195 removal area and areas of previous and proposed sampling are presented on Figures 1, 2, and 3.

2.7 Other Actions to Date

Previous actions at Building 195 include site characterization sampling activities during the EBS program. Current actions include the proposed time-critical removal activities at the site. This section summarizes previous and current actions.

2.7.1 Previous Actions

Soil sampling at Parcel 98 began with the Phase 2A EBS in 1994 and 1995. Surface soil samples were collected at several locations within Parcel 98 and analyzed for Contract Laboratory Program (CLP) pesticides/polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPH). Sampling locations were selected to target several areas, including Building 195, the Maintenance Yard, Landscaped Areas between housing units, and filled wetlands. As previously stated, dieldrin was present at elevated levels in two samples in the vicinity of Building 195. Also, motor oil–range petroleum hydrocarbons were detected in the surface soil samples in the vicinity of Building 195, but at low concentrations.

Phase 2B EBS step-out sampling was performed in 1995 to delineate the extent of dieldrin contamination discovered during Phase 2A. Surface and subsurface soil samples were collected from locations within the Maintenance Yard and in the vicinity of Building 195 in order to more completely delineate the extent of contamination observed in the Phase 2A samples. Phase 2B samples were analyzed for CLP pesticides/PCBs and TPH. No compounds were detected in concentrations exceeding residential PRGs. Analytical results indicated that although low

concentrations of pesticides (4,4'-DDD, 4,4'-DDE, and 4,4'-DDT) (below residential PRGs) were present in soil within the Maintenance Yard, the areal extent of soil with elevated dieldrin appears to be limited to the area on the western side of Building 195.

2.7.2 Current Actions

Current actions at Building 195 include the proposed time-critical removal activities associated with the dieldrin-contaminated soil. Removal of the impacted soil will necessitate the dismantling and disposal of Building 195.

2.8 State and Local Authorities' Roles

Building 195 and Parcel 98 are part of a federal facility. Section 120(f) of CERCLA requires that the Navy give appropriate state and local officials the opportunity to participate in planning and selection of remedial actions at Navy facilities. The EPA is the federal regulatory agency for CERCLA activities at NPL sites (e.g., Alameda Point), and is reviewing and commenting on the Navy's CERCLA response activities at Alameda Point. The Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) are state support agencies overseeing cleanup activities at Alameda Point. As stated previously, the Navy has discussed the conditions of the Building 195 removal area with EPA, DTSC, and RWQCB and has received verbal concurrence for this removal action from these agencies.

3.0 Threats to Public Health or Welfare or the Environment, and Statutory and Regulatory Authorities

Based upon the (1) elevated concentrations of dieldrin in soils, (2) presence of lead-based paint on Building 195 and the threat of release of lead-based paint to the soil, and (3) the intended residential reuse of this property, the Navy determined that this area poses a potential threat to public health and welfare and the environment and that a time-critical removal action pursuant to CERCLA Section 104(a) was appropriate to mitigate these threats. The potential threats are discussed below.

3.1 Threats to Public Health and Welfare

Dieldrin was detected in two soil samples at concentrations up to 0.75 mg/kg in soil samples collected from within and adjacent to Building 195. To remove the soil, Building 195 would have to be dismantled and disposed. Analysis of peeling lead-based paint from the exterior surface of Building 195 confirmed the presence of lead in the paint. The following threat to public health and welfare as defined in NCP Sections 300.415(b)(2)i is present at Building 195:

> **Actual or potential exposure of nearby human populations to hazardous substances, pollutants, or contaminants.** People residing, working, or playing at the site may be exposed to soil contaminated with dieldrin and lead through direct contact or incidental ingestion. Dieldrin and lead are hazardous substances known to pose a threat to human health.

3.2 Threats to the Environment

The concentrations of dieldrin noted above exceed the EPA residential PRG of 0.03 mg/kg. The presence of dieldrin, and potentially lead, in surface soil at this location creates the potential for these compounds to migrate via chemical or physical means thus impacting a larger area.

4.0 Endangerment Determination

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

Human exposure to dieldrin and lead through direct contact with or incidental ingestion of contaminated soil poses a potential threat to public health and welfare if the removal action described in this document is not implemented.

5.0 Proposed Action and Estimated Costs

This section describes the removal action for contaminated soil at Building 195. It also provides an explanation of why an engineering evaluation/cost analysis (EE/CA) was not performed, discusses applicable or relevant and appropriate requirements (ARARs), and discusses the estimated cost of the removal action.

5.1 Proposed Action Description

The removal action will consist of the following tasks:

- Pre-excavation soil and groundwater sampling
- Lead-based paint removal and demolition of Building 195
- Excavation of impacted soils
- Post-excavation confirmatory sampling
- Backfilling and site restoration

Fieldwork is expected to begin in mid- to late October and be completed by October 31, 2001.

Pre-Excavation Soil and Groundwater Sampling

Prior to excavation activities, surface soil samples will be collected from 12 locations and subsurface soils at 2 locations to delineate the horizontal and vertical extent of elevated dieldrin concentrations in the area west of Building 195 and to determine if the soil has been impacted by lead from peeling lead-based paint. To delineate the extent of lead potentially present in surface soil, surface soil samples will be collected along the north, east, and south sides of Building 195 and analyzed for lead. Soil sampling locations are presented in Figure 3. The excavation limits will be defined by the analytical results of these samples. Areas where dieldrin is observed in concentrations exceeding its PRG of 0.03 mg/kg will be excavated; soil with concentrations of lead exceeding 209 mg/kg (as derived using DTSC's Leadspread Model [Version 7]) will also be excavated. If concentrations of dieldrin and lead are found exceeding their respective cleanup goals over a much larger area than that depicted on Figure 3, this aspect of the removal action will be re-evaluated with the BCT. The cleanup goal of 0.03 mg/kg for dieldrin corresponds to a carcinogenic risk of 1.0E-06. Carcinogenic risks and non-carcinogenic hazard indices cannot be quantified for lead in the same manner as for other chemicals because EPA-approved slope factors and toxicity values are currently unavailable. Blood-lead concentrations are an integrated measure of an internal dose that reflects exposure from site-related and background sources; the lead concentration of concern in children and adults is 10 ug/dL of whole blood. The U.S. EPA and Cal/EPA points of departure for risk management are 0.05 (95th percentile) and 0.01 (99th

percentile) risk, respectively, of exceeding this value. The cleanup goal of 209 mg/kg for lead corresponds to the more conservative concentration for children in the 99th percentile.

Lead-based Paint Removal and Demolition of Building 195

Building demolition will include the removal of the building interior shell, the removal of any loose and peeling paint from the exterior panels, and disassembly of Building 195. The paint on the corrugated steel panels, which form the exterior of the structure, is peeling over significant areas. During building demolition, the loose and peeling lead-based paint will be removed by qualified lead removal workers. Appropriate measures will be taken during the lead removal to prevent introduction of lead-bearing paint chips into the soil or atmosphere. The lead-containing materials will be containerized and disposed of at an appropriate disposal facility. Building debris not associated with lead-based paint will be removed and containerized for disposal as municipal waste. The corrugated steel panels removed from the building will be stacked on suitable high-density polyethylene (HDPE) liners or placed in scrap material containers until transported to an appropriate disposal/recycling facility.

Soil Excavation

The approximate area to be excavated west of Building 195 is illustrated in Figure 3. Based on existing analytical data, it is expected that the area to be excavated to a depth of 2 feet below ground surface (bgs) is an area measuring approximately 18 feet by 28 feet. If elevated concentrations of lead are observed in the surface soil samples collected from the north, east, or south sides of Building 195, soil will be excavated from the building wall to a distance from the building indicated by the analytical results. Soil in these areas will be excavated to a depth of 1 foot bgs. Soil will be excavated with a backhoe, and placed directly into 20-yard roll-off dumpsters, covered, and temporarily stored on site. Samples will be collected, sufficient to characterize the excavated soil for disposal.

Removal action activities are not expected to intercept groundwater. Once characterized, the excavated soil will be transported off site to a RCRA land disposal facility approved to dispose of CERCLA waste, in accordance with Section 300.440 of the NCP. Based on the expected dimensions of the excavation, it is estimated that approximately 37 cubic yards of soil will be removed.

Post-Excavation Confirmatory Soil Sampling

After completion of excavation activities, a series of post-excavation confirmatory soil samples will be collected to verify that the soil containing elevated pesticides and lead has been effectively removed. At the excavation on the western side of Building 195, samples will be

collected from each of the four sidewalls and from two locations on the floor of the excavation. These samples will be analyzed for pesticides, PCBs, and lead. If excavations are required on the north, east, or south sides of Building 195 due to elevated lead concentrations, a composite sample will be collected from the floor of the excavation from each side of the building that is excavated. These samples will be analyzed for lead only.

Backfilling and Site Restoration

Following the completion of excavation activities, clean imported fill and/or crushed rock material will be placed in the bottom of the excavation followed by common borrow material to the surface and recontoured to original grade.

5.2 Contribution to Remedial Performance

It is anticipated due to the small size of the affected area that removal of the dieldrin- and lead-contaminated soil will fulfill remediation requirements for this area and that no further action will be required.

5.3 Description of Alternative Technologies

Alternatives to excavation and land disposal, including application of a surface cap and stabilization of the contaminated soil, were considered but quickly dismissed due to the anticipated small area affected and the future reuse of the area.

5.4 Engineering Evaluation/Cost Analysis

An EE/CA was not conducted due to the time-critical nature of this removal action (see Title 40 of the Code of Federal Regulations (40 CFR), 300.415[b][4]). The estimated cost of the removal action is discussed in Section 5.7.

5.5 Applicable or Relevant and Appropriate Requirements

The purpose of conducting the removal action is to reduce risks to human health by removing lead and dieldrin-contaminated soil from the vicinity of Building 195. The removal of soil in which lead and dieldrin exceed their respective cleanup goals will eliminate the potential exposure pathway at Building 195.

The Federal Superfund Amendments and Reauthorization Act of 1986 (SARA) requires consideration of ARARs for removal actions at a site. Applicable requirements are promulgated federal or state standards that specifically address a hazardous constituent, removal action, location, or other conditions at a site. Relevant and appropriate requirements are promulgated federal or state requirements that address problems or situations sufficiently similar to those

encountered at a hazardous waste site; these requirements may or may not be directly related to the circumstances at a CERCLA site. ARARs to be attained for the Building 195 soil removal action are summarized in Table 1.

5.6 Project Schedule

The removal action will begin in mid- to late October and is anticipated to be completed by October 31, 2001. Following completion of the field activities, a removal action report will be prepared.

5.7 Estimated Cost

The cost of the removal action is approximately $160,000, which includes physical restoration of the site. A breakdown of the costs is as follows:

Engineering and Design	$ 28,500
Investigation	27,400
Demolition, Excavation, and Loading	49,000
Transportation and Disposal	46,500
Reporting	8,600
	$ 160,000

6.0 Expected Changes in the Situation Should Action Be Delayed or Not Taken

If action should be delayed or not taken, exposure of human populations to dieldrin and lead will continue from exposure to the affected soil and peeling paint on the building. Contamination may spread from the affected area to other areas within the Parcel 98 housing area via wind erosion of the lead-based paint or migration into the groundwater via seasonal rainy periods. This potential spread of contamination would result in an increased health risk to the exposed population. Delayed action will also increase public health risks to the adjacent population through prolonged exposure to contaminants.

If the action should be delayed or not taken, contamination will be allowed to continue to migrate, thereby, potentially resulting in a greater volume of material to be remediated. This will result in an increase in treatment and/or disposal costs.

7.0 Public Involvement

A detailed description of the proposed time-critical removal action was presented to the Alameda Point Restoration Advisory Board on September 4, 2001. The Navy will circulate the Action Memorandum and Administrative Record for public comment within 60 days following initiation of site activities. The public comment period for the Action Memorandum and Administrative Record will continue for 30 days commencing approximately December 21, 2001. A summary of the comments received and the Navy's responses will be forthcoming following the close of the public comment period.

8.0 Outstanding Policy Issues

No outstanding policy issues are associated with Building 195.

9.0 Recommendation

To date, the Navy has not acquired evidence identifying other potentially responsible parties at this site. However, information acquired in the future including, but not limited to, information acquired during the implementation of this removal action or future response actions at the site, could result in the identification of other potentially responsible parties.

The Action Memorandum was performed in accordance with current EPA and U.S. Navy guidance documents for time-critical removal actions under CERCLA. The purpose of this Action Memorandum is to identify and analyze removal actions to address dieldrin- and lead-impacted soil at Building 195 at Alameda Point. Based on the anticipated small area affected at Building 195, the removal action alternative selected was soil excavation and land disposal. This alternative is recommended because it (1) will be highly effective in removing the affected soil exceeding the cleanup criteria, (2) is easily implementable, and (3) is cost effective.

This decision document represents the selected removal action for the Building 195 area on Parcel 98 at Alameda Point in Alameda, California, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP.

Michael E. McClelland, P.E.
Base Realignment and Closure Environmental Coordinator
Southwest Division Naval Facilities Engineering Command

Date 10/2/01

FIGURES

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
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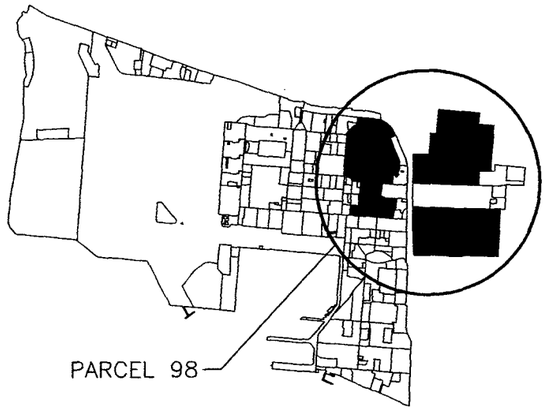
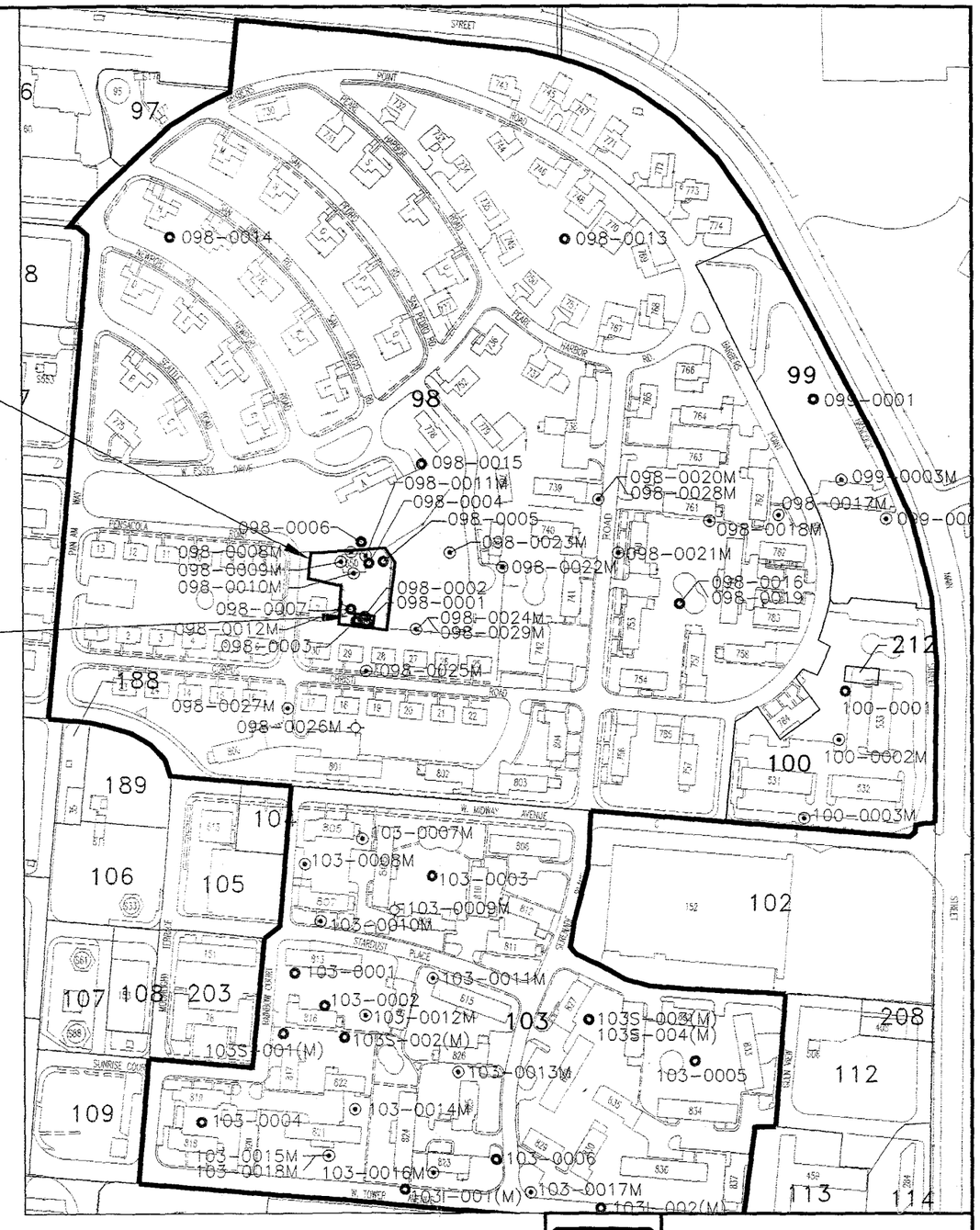


KEY PLAN



LEGEND

98	PARCEL NAME
▬▬	PARCEL BOUNDARY
⊹	SUBSURFACE SOIL SAMPLE
●	SURFACE SOIL SAMPLE
⊙	SOIL GAS SAMPLE
⊹	AIR SAMPLE
000-0000(M)	CONFIRMATION AND SCREENING SAMPLE TAKEN

SCALE

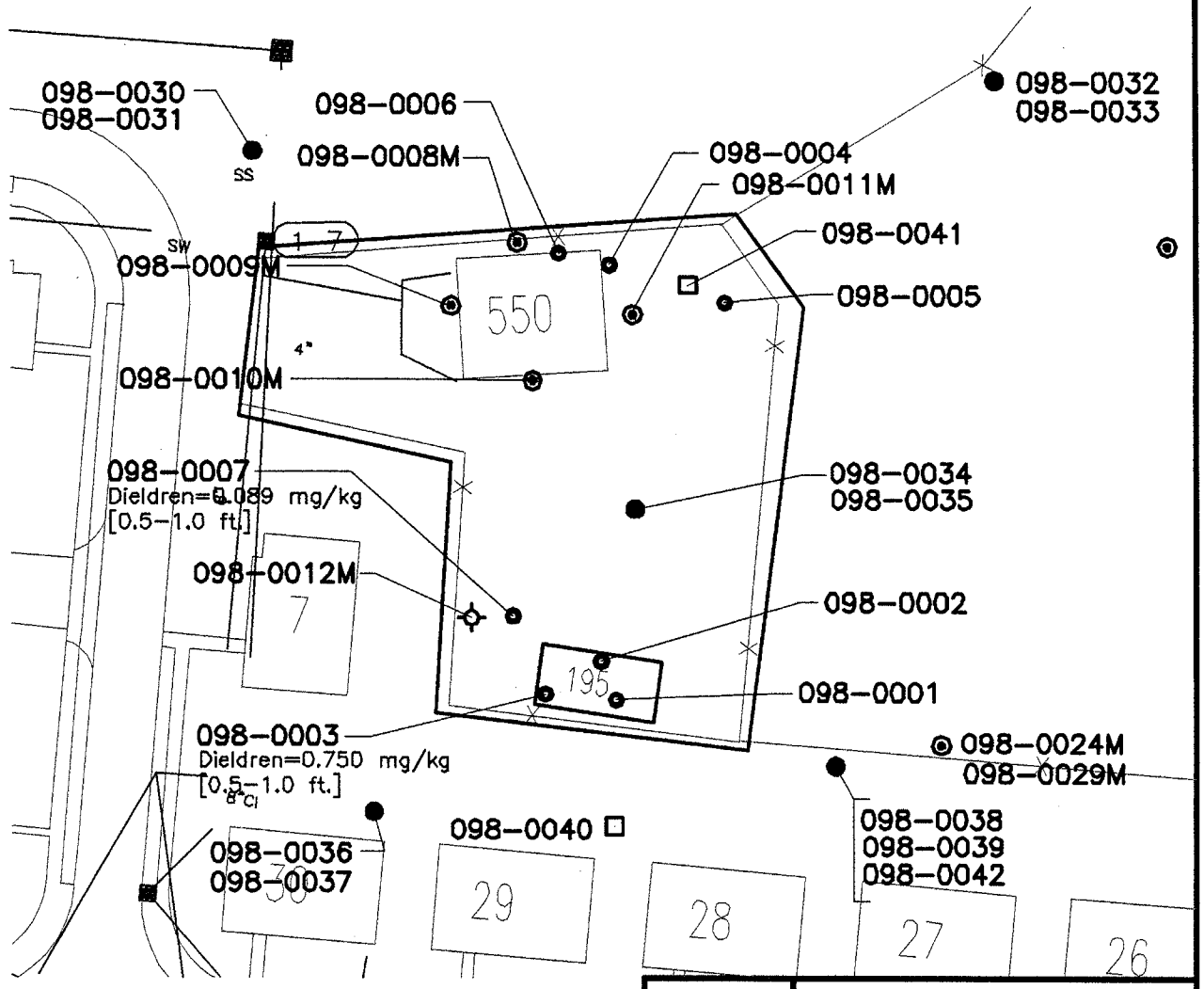
0 300 600 FEET

IT CORPORATION

DEPARTMENT OF THE NAVY
ENGINEERING FIELD DIVISION
SOUTHWEST DIVISION
SAN DIEGO, CALIFORNIA

FIGURE 1
LANDSCAPE MAINTENANCE AREA
LOCATION MAP
ALAMEDA POINT
ALAMEDA, CALIFORNIA

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
---	ZONE22	Concord	BJ	3-28-01	[illegible]	10-3-2001	[illegible]	10/2/01	807181-A16



GENERAL LEGEND

- PARCEL OUTLINE
- SURFACE AND SUBSURFACE SOIL SAMPLE
- 2 SUBSURFACE SOIL SAMPLE & NO.
- 6 SURFACE SOIL SAMPLE & NO.
- 8 SOIL GAS SAMPLE & NO.
- (10) SANITARY SEWER MANHOLE NO.
- SW SANITARY SEWER LINE
- 12A-1 STORM DRAIN MANHOLE & NO.
- CATCH BASIN
- SS STORM SEWER LINE

1. ALL SANITARY SEWERS ARE VITRIFIED CLAY PIPE UNLESS NOTED OTHERWISE.

NOTE: PARCEL BOUNDARIES ARE APPROXIMATE.

SCALE

0 60 120 FEET

IT CORPORATION

DEPARTMENT OF THE NAVY
ENGINEERING FIELD DIVISION
SOUTHWEST DIVISION
SAN DIEGO, CALIFORNIA

FIGURE 2
PARCEL 98, BUILDING 195
PREVIOUS SAMPLE LOCATION
AND PESTICIDE EXCEEDANCE MAP
PESTICIDE STORAGE SHED

ALAMEDA POINT ALAMEDA, CALIFORNIA

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER	807181-A17
---	ZONE22	Concord	BJ	7-24-01	TDAult	10-3-2001		10/2/01		

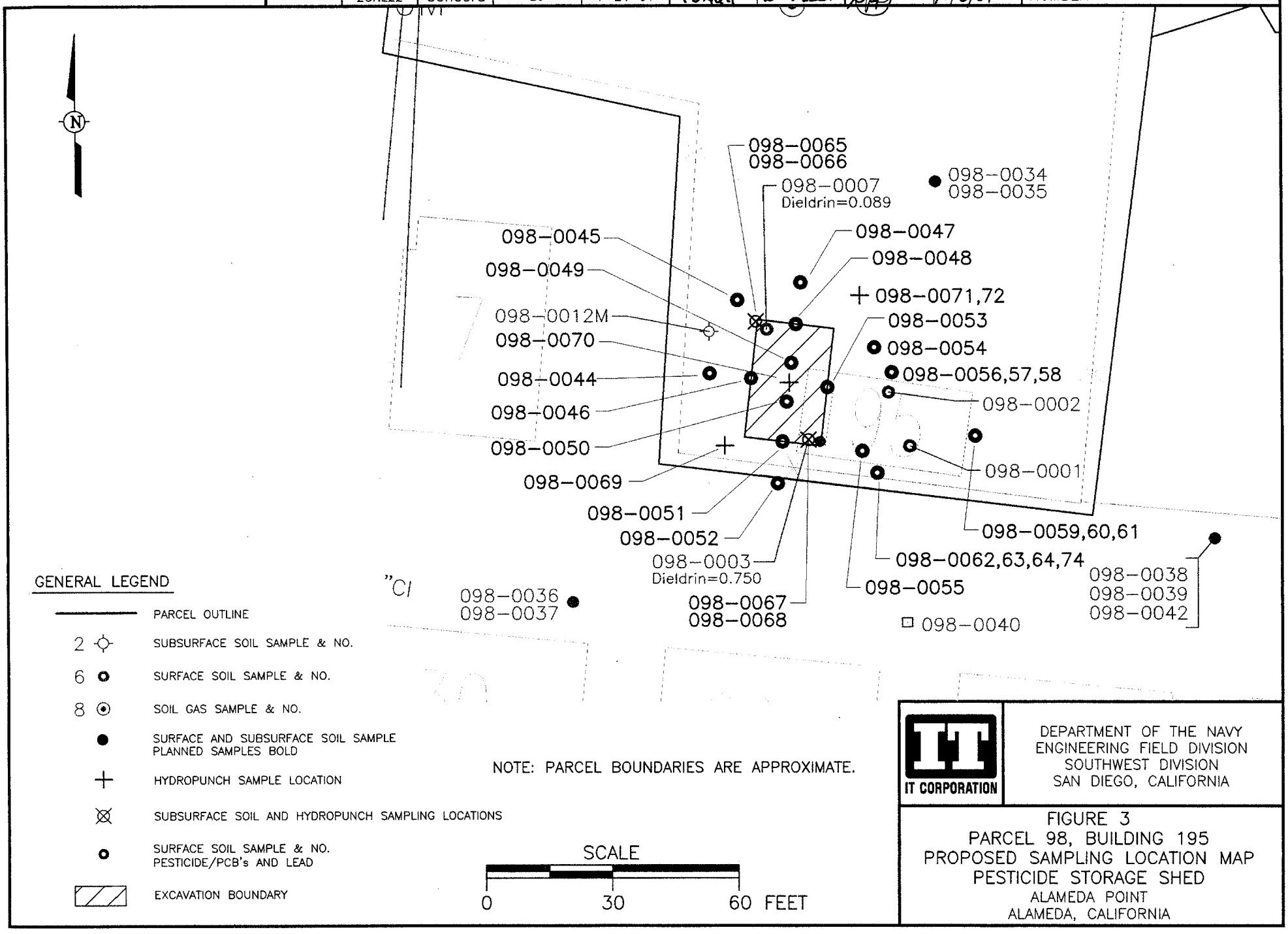


FIGURE 3
PARCEL 98, BUILDING 195
PROPOSED SAMPLING LOCATION MAP
PESTICIDE STORAGE SHED
ALAMEDA POINT
ALAMEDA, CALIFORNIA

TABLES

Table 1
Applicable or Relevant and Appropriate Requirements for Soil Removal at Building 195

Citation	ARAR Classification	Description	Comments
Coastal Management Zone Act; 16USC 1456(c)(1)(A); 15CFR 930	Applicable	Requires federal agencies to conduct activities affecting the coastal zone consistent to the maximum extent practicable with approved state management programs.	The coastal zone is defined as 1000 yards inland from mean high tide. Building 195 is located within the coastal zone; therefore, active removal activities at the facility may affect land or water use, or natural resources of the coastal zone at adjacent facilities.
California Water Pollution Prohibition Act (California Fish and Game Code Section 5650)	Relevant and appropriate	Prohibits the deposition, directly or indirectly, of any substance or material that is deleterious to fish, plant, or bird life into waters of the state.	These requirements are relevant and appropriate to protect fish, plants, or birds that may use the Oakland Inner Harbor from contamination resulting from excavation and treatment activities.
22 CCR Sections 66261.10, 66261.21, 66261.22(a)(1), 66261.23, 66261.24(a)(1), and 66261.100	Applicable	Establishes criteria for identifying hazardous waste.	The requirements will apply to characterize the excavated soil to determine whether it must be managed as hazardous waste.
22 CCR Sections 66262.1, 66262.11, 66262.20, 66262.30, 66262.31, 66262.32, 66262.33, and 66262.34	Applicable	Establishes standards for generators of hazardous waste.	If excavated soil is hazardous waste, these requirements will apply to managing excavated soil prior to shipment off site.
22 CCR Section 66268.7(a)	Applicable	Sets requirements for testing excavated soil to see if it is restricted for land disposal.	This regulation requires generators to determine if treatment is required prior to land disposal.
22 CCR Section 66261.24(a)(2)	Applicable	Establishes criteria for identifying California hazardous waste.	This requirement applies to characterize excavated soil to determine if it is a California hazardous waste.
BAAQMD Regulation 6-301, 302, and 305	Applicable	Sets requirements for controlling particulate and visible emissions during excavation and transport.	These requirements may be applicable to excavation and handling of soils.
Lead Based Paint Poisoning Prevention in Certain Residential Structures, 40 CFR 745.227(e)(7)(i)(A) and 24 CFR 35.56	Relevant and Appropriate	If soil is to be removed, it shall be replaced by soil with a lead concentration no greater than 400 mg/kg.	These requirements are relevant and appropriate to the soil to be excavated even though the established cleanup goal for this action is lower than 400 mg/kg (i.e., 209 mg/kg).
Transportation of hazardous material 49 USC §§ 5101-5127 49 CFR § 171.2(f), 171.2(g), 172.300, 172.301,172.302, 172.303172.304, 172.312, 172.400, 172.504	Relevant and appropriate	Sets forth requirements for transporting hazardous waste including representations that containers are safe, prohibitions on altering labels, marking requirements, labeling requirements and placarding requirements.	Relevant and appropriate for transporting hazardous materials on-site.
BAAQMD Regulation 8-40-301 and 8-40-303	Relevant and appropriate	Limits uncontrolled aeration of stockpiled soil.	These requirements are applicable to contaminated soil that are excavated and stockpiled.
23 CCR 2546	Relevant and appropriate	Requires precipitation and drainage controls to limit to the greatest extent possible, inundation, erosion, or other conditions affecting stockpiled soils.	These requirements are relevant and appropriate to stockpiles generated from excavation of soil if the soil must be managed as a hazardous waste.

CCR denotes California Code of Regulations.

BAAQMD denotes Bay Area Air Quality Management District.

APPENDIX A
ADMINISTRATIVE RECORD INDEX

ALAMEDA POINT NAS

DRAFT ADMINISTRATIVE RECORD FILE INDEX - UPDATE (SORTED BY RECORD DATE/RECORD NUMBER)

DOCUMENTS RELATED TO ENVIRONMENTAL BASELINE SURVEYS (EBS)

UIC No. / Rec. No. Doc. Control No. Record Type Contr./Guid. No. Approx. # Pages	Prc. Date Record Date CTO No. EPA Cat. #	Author Affil. Author Recipient Affil. Recipient	Subject	Classification	Keywords	Sites	Location Box No.
N00236 / 001054 LTR NONE 0000	11-24-1999 **05-11-1994** NONE 00.0	ERM WEST	SUBMISSION OF ENVIRONMENTAL BASELINE SURVEY (EBS) AND COMMUNITY ENVIRONMENTAL RESPONSE FACILITATION ACT (CERFA) REPORT	INFO REPOSITORY	CERFA EBS		IRON MOUNTAIN 45359734
N00236 / 001639 RESP NONE 0010	11-24-1999 **11-19-1998** NONE 00.0	NAVY YIP, WARREN DTSC CASSA, MARY ROSE	RESPONSE TO COMMENTS ON PARCEL RECLASSIFICATION FOR ENVIRONMENTAL BASELINE SURVEY (EBS)	ADMIN RECORD			IRON MOUNTAIN 45359750
N00236 / 000210 NONE PLAN N62474-93-D-2151 0040	08-09-2001 **12-21-1998** DO110	IT CORPORATION T. DAVIS NAVFAC - WESTERN DIVISION	CONTRACTOR QUALITY CONTROL PLAN, ZONE 24 - PARCEL 215 EVALUATION, AND ENVIRONMENTAL BASELINE SURVEY (EBS) PHASE 2C, TODD SHIPYARD, REVISION 0 {SEE AR #220 - REVISION 1}	ADMIN RECORD	EBS	PARCEL 215	SOUTHWEST DIVISION

This Administrative Record (AR) Index includes references to documents which cite bibliography sources. These bibliographic citations are considered to be part of this AR but may not be cited separately in the index.

UIC No. / Rec. No. Doc. Control No. Record Type Contr./Guid. No. Approx. # Pages	Prc. Date Record Date CTO No. EPA Cat. #	Author Affil. Author Recipient Affil. Recipient	Subject	Classification	Keywords	Sites	Location Box No.
N00236 / 000120 1592.0 & 1592.1 RPT 80462393, RPT N62474-98-D-2076 8000	06-28-2001 **01-01-2001** 00022 00022	IT CORPORATION NAVFAC - NAVFAC - SOUTHWEST DIVISION	FINAL - ENVIRONMENTAL BASELINE SURVEY (EBS) - (16 VOLUMES) - INCLUDES ELECTRONIC VERSION {SEE AR #158 - GUIDE TO FINAL EBS}	ADMIN RECORD INFO REPOSITORY REPOSITORY	PAH PCB SVOC SWMU TPH USE UXO VOC	ZONE 1 ZONE 10 ZONE 11 ZONE 11 ZONE 12 ZONE 13 ZONE 14 ZONE 15 ZONE 16 ZONE 17 ZONE 18 ZONE 19 ZONE 2 ZONE 20 ZONE 21 ZONE 22 ZONE 23 ZONE 24 ZONE 3 ZONE 4 ZONE 5 ZONE 6 ZONE 7 ZONE 8 ZONE 9	IRON MOUNTAIN 80462391, 80462392, 80462392, 80462393, 80462394, 80462395

UIC No. / Rec. No. Doc. Control No. Record Type Contr./Guid. No. Approx. # Pages	Prc. Date Record Date CTO No. EPA Cat. #	Author Affil. Author Recipient Affil. Recipient	Subject	Classification	Keywords	Sites	Location Box No.
N00236 / 000158 1592.2 RPT RPT N62474-98-D-2076 0500	07-03-2001 **06-29-2001** 00022 00022	IT CORPORATION D. SHAFER NAVFAC - NAVFAC - SOUTHWEST DIVISION	FINAL COMPREHENSIVE GUIDE TO THE ENVIRONMENTAL BASELINE SURVEY (EBS), VOLUME 0, REVISION 0 {SEE AR #120 - FINAL EBS}	ADMIN RECORD INFO REPOSITORY REPOSITORY	EBS PAH PCB SVOC SWMU TPH USE UXO VOC	ZONE 1 ZONE 10 ZONE 11 ZONE 11 ZONE 12 ZONE 13 ZONE 14 ZONE 15 ZONE 16 ZONE 17 ZONE 18 ZONE 19 ZONE 2 ZONE 20 ZONE 21 ZONE 22 ZONE 23 ZONE 24 ZONE 3 ZONE 4 ZONE 5 ZONE 6 ZONE 7 ZONE 8 ZONE 9	IRON MOUNTAIN 80462397

((SUBJECT Like "*ebs*" Or SUBJECT Like "*environmental baseline survey*")) AND [UIC NUMBER]='N00236'