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ALAMEDA POINT
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Terry Tamminen
Agency Secretary
Cal/EPA

Department of Toxic Substances Control

Edwin F. Lowry, Director
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721



Arnold Schwarzenegger
Governor

December 18, 2003

Ms. Glenna Clark
Department of Navy
Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

DRAFT PROPOSED PLAN, INSTALLATION RESTORATION SITES 14 AND 15, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Ms. Clark:

The Department of Toxic Substances Control (DTSC) has reviewed the draft Proposed Plan for Installation Restoration (IR) Sites 14 and 15 submitted by the Navy on October 2, 2003. It appears that the proposed remedy does not address the concerns DTSC raised in the letter dated September 9, 2003 concerning the revised draft final Feasibility Study (FS) submitted by the Navy on July 25, 2003. In that comment letter, DTSC expressed concerns on Monitored natural Attenuation/Land Use Control (MNA/LUC) and stated that MNA/LUC is a viable remedial alternative only if certain conditions are met.

Specifically, DTSC is concerned that the line of evidence supporting the presence of natural attenuation at Site 14 is relatively weak. The trend graphs, for example, do not conclusively show the occurrence of natural attenuation at Site 14 (see Figures 4-10 through 4-13 and page 4-20 of the RI report). Mann-Kendall statistical test, on the other hand, reports that the concentration of volatile organic compounds (VOCs) at Site 14 has not decreased in the past 10 years (see Appendix C, page C-2 of the FS report). Furthermore, the projected time frame to achieve the remedial objective by natural attenuation (i.e. 100 years) is long, the proposed monitoring scheme (e.g. sampling every five years) is insufficient, and the cost analysis is optimistic. It is DTSC's position that our concerns as detailed in the September 9, 2003 comment letter should be addressed before the MNA/LUC alternative can be considered further.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.dtsc.ca.gov.

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Also, please be advised that DTSC is concerned that the final Remedial Investigation (RI) report and the follow-up clarification letter issued by the Navy on June 6 and July 25, 2003, respectively, do not fully meet the requirements of either Chapter 6.8 or 6.5 of California Health and Safety Code (HSC).

Specifically, we are concerned that the source contributing to groundwater contamination at Site 14 has not been positively identified. Most of the explanations or conclusions presented in the RI with respect to the source issues appear to be little more than conjectures. Page 4-20, for example, states "A spill of TCE near the heart of the groundwater plume would explain the presence of vinyl chloride and other chlorinated solvents". It continues to state, "Although VOC data for soil is limited, it is believed that the source of the VOCs in groundwater at Site 14 is gone, and no further sources exist" and "It is expected that any VOC contamination in soil would have migrated to groundwater".

It is our belief that a RI needs to identify, to the extent possible, the source of groundwater contamination. For a given historical spill or release occurred at an area of shallow groundwater (e.g. Site 14), it is possible that little VOC remains in the vadose zone and most contaminants have migrated below the water table into the saturated zone. It is, however, worth noting that migrating below the water table does not automatically mean that all contaminants have left the soil matrix or dissipated into the water column, and the "source" is gone. Usually, it is our understanding that contaminants moving below the water table still stay adsorbed onto the soil matrix. This adsorbed phase continues to act as the source of release through de-sorption and dissipation into the groundwater over time. This process is dictated by the equilibrium between the soil and groundwater and is usually slow especially at an area of low groundwater gradient (e.g. Site 14).

Presently, the RI for Site 14 has provided little evidence that sufficient time has elapsed and VOCs in the soil have all dissipated into the groundwater. It is our opinion that the source (or sources) may still exist, perhaps below the water table, slowly releasing VOCs into the groundwater and natural attenuation may prove elusive if the sources remain unabated.

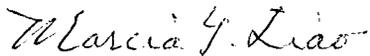
DTSC requests that a more strenuous case be presented with respect to the source(s) of groundwater VOC plumes at Site 14. We also request that 1) a map be prepared depicting all soil VOC sampling locations and depths, along with pertinent site features (please highlight locations where VOCs were detected or detection limits were elevated (e.g. greater than the PRGs)) and 2) the sanitary sewer along Perimeter Road near monitoring well M101-A be evaluated (e.g. integrity tests of the sewer, sampling of the bed material, and groundwater

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samples) to rule out the possibility that the sewer line may have leaked and contributed to the groundwater contamination.

DTSC looks forward to working with the Navy to resolve the remaining issues in the RI/FS and move forward with the Proposed Plan and final remedy selection. Should you have any questions, please do not hesitate to give me a call at (510) 540-3767.

Sincerely,



Marcia Liao, Ph.D., CHMM
Remedial Project Manager
Office of Military Facilities

cc: Thomas Macchiarella, SWDiv
Greg Lorton, SWDiv
Anna-Marie Cook, EPA
Judy Huang, RWQCB
Elizabeth Johnson, City of Alameda
Peter Russell, Northgate Environmental
Jean Sweeney, RAB Co-Chair
Lea Loizos, Arc Ecology