

FINAL

ACTION MEMORANDUM

***Time-Critical Removal Action at IR Site 30 (Miller School/Woodstock
Child Development Center)
Alameda Point, Alameda, California***

***Environmental Remedial Action
Contract Number N62474-98-D-2076
Contract Task Order 0107***

***Document Control Number 9454
Revision 0***

July 27, 2005

Submitted to:

Base Realignment and Closure
Program Management Office West
1230 Columbia Street, Suite 1100
San Diego, California 92101

Submitted by:

Shaw Environmental, Inc.
4005 Port Chicago Highway
Concord, California 94520-1120



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
1230 COLUMBIA STREET, SUITE 1100
SAN DIEGO, CA 92101-8571

5090
Ser BPMOW.DN\1002
July 27, 2005

Ms. Anna-Marie Cook
US EPA
Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Ms. Cook:

This letter transmits the *Final Action Memorandum, Time-Critical Removal Action at IR Site 30 (Miller School/Woodstock Child Development Center) Alameda Point, Alameda, California.*

This document identifies a Time Critical Removal Action (TCRA) alternative for soil at Installation Restoration Site 30— the George P. Miller Elementary School and Woodstock Child Development Center. The TCRA was initiated November 17, 2004 and was completed December 2, 2004.

In accordance with CERCLA, the Navy published a notice of availability of the administrative record on June 14, 2005 in the Alameda Times Star, the Alameda Journal and the Oakland Tribune. The Navy did not receive any public comments during the review period.

If you have any questions, please call Mr. Darren Newton, Remedial Project Manager at (619) 532-0963.

Sincerely,

THOMAS L. MACCHIARELLA
BRAC Environmental Coordinator
By direction of the Director

Encl: (1) Final Action Memorandum, Time-Critical Removal Action at IR Site 30 (Miller School/Woodstock Child Development Center) Alameda Point, Alameda, California, July 27, 2005 (3 copies)

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July 27, 2005

Copy to:

Ms. Marcia Y. Liao (2 copies)
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Ms. Elizabeth Johnson
City of Alameda, ARRA
950 Mall Square, Bldg 1
Alameda Point
Alameda, CA 94501

Ms. Judy Huang
San Francisco Bay
Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Mr. Michael Allen
CDM Federal
9444 Farnham Street Suite 210
San Diego, CA 92123-1360

Mr. Bud Duke
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Mr. Eric Johansen
Bechtel
1230 Columbia Street, Suite 400
San Diego, CA 92101

Mr. Peter Russell
Russell Resources Inc.
440 Nova Albion Way, Suite 1
San Rafael, CA 94903

Ms. Ardella Dailey
Assistant Superintendent
Alameda Unified School District
2200 Central Avenue
Alameda, California 94501

Arc Ecology
833 Market Street
Suite 1104
San Francisco, CA 94117
United States of America

Ms. Kamili Siglowide
Dept of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Mr. Douglas Davenport
Tetra Tech EM Inc.
135 Main Street, Suite 1800
San Francisco, CA 94105

Mr. Jack P. Hug
Chief, Environmental Law Branch
U. S. Coast Guard MLCPAC (Legal)
Coast Guard Island, Bldg. 54C
Alameda, CA 94501-5100

Mr. Dan Baden
Shaw Environmental
4005 Port Chicago Hwy
Concord, CA 94520

LT Lisa Houlihan
MLCPAC Legal
Coast Guard Island, Building 54C
Alameda, CA 94501

Mr. David Sox (2 copies)
USCG Maintenance and Logistics
1301 Clay Street, Suite 700N
Oakland, CA 94612

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



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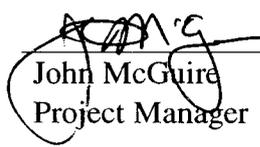
TO: Administrative Contract Officer
Southwest Division
Naval Facilities Engineering Command
Graciela Steinway, AQE.GS
1220 Pacific Highway
San Diego, CA 92132-5190

Date : July 27, 2005

CTO : 0107

Location: Alameda

FROM:


John McGuire
Project Manager

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- Kamili Siglowide, Department of Toxic Substances Control (1C/1E)
- David Sox, USCG Maintenance and Logistics (1C/2E)

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Acronyms and Abbreviations

µg/kg	microgram per kilogram
ARAR	applicable or relevant and appropriate requirement
B[a]P	benzo(a)pyrene
BCT	Base Realignment and Closure Cleanup Team
BEI	Bechtel Environmental, Inc.
BRAC	Base Realignment and Closure
Cal EPA	California Environmental Protection Agency
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
DTSC	Department of Toxic Substances Control
IR	Installation Restoration
Miller School	George P. Miller Elementary School
Navy	U.S. Department of Navy
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
PAH	polynuclear aromatic hydrocarbon
RAB	Restoration Advisory Board
RI	remedial investigation
TCRA	time-critical removal action
WCDC	Woodstock Child Development Center
U.S.C.	U.S. Code
U.S. EPA	U.S. Environmental Protection Agency

1.0 Purpose

The purpose of this Action Memorandum is to document, for the Administrative Record, the U.S. Department of the Navy's (Navy) decision to undertake a time-critical removal action (TCRA) to mitigate the potential risk of human health exposure to polynuclear aromatic hydrocarbons (PAHs) at Installation Restoration (IR) Site 30 in Alameda Point, California (Figure 1). Because of the urgency of the situation, the removal action was executed at the site prior to completion of this Action Memorandum. The Navy undertook the action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) response actions, including removal actions, under 42 U.S. Code (U.S.C.) Section 9604 and 10 U.S.C. Section 2705. The Department of Defense has the delegated authority to undertake CERCLA response actions via Federal Executive Order 12580.

IR Site 30 is occupied by two main facilities: the Woodstock Child Development Center (WCDC) and the George P. Miller Elementary School (Miller School). Investigations conducted at the site indicated the presence of PAHs at concentrations above 620 micrograms per kilogram ($\mu\text{g}/\text{kg}$) (a human-health screening criterion) in the soil. The source of the PAHs in the soil may have originated from former petroleum-related industrial activities occurring in the region before the Navy occupied the area (Bechtel Environmental, Inc. [BEI], 2004).

Potential on-site receptors to the PAHs in soil are the children who attend the WCDC and Miller School and the adults who work there. Unpaved, deteriorating ground covers exist in play areas where the children frequent and have unrestricted access at the WCDC and the school. Therefore, the risk for the potential exposure of children to the PAHs in the underlying soil in those areas is greater. As such, an immediate implementation of this removal action was performed to address the potential human health exposure risk at the site. The TCRA for this site is consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 Code of Federal Regulations (CFR) Part 300 (CFR, 2003).

2.0 Site Conditions and Background

This section describes the site location, site characteristics, releases or threatened releases of a hazardous substance or contaminant into the environment, 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 Site Description

IR Site 30 covers approximately 7 acres of land. Much of the site is open space and was historically used for storage and parking. Current occupants at the site are the WCDC and Miller School. The entire site is fenced, with gated access for personnel and vehicles. A site layout map is shown in Figure 2.

2.2 Removal Site Evaluation

The site was included in the IR program after results of sampling conducted as part of a remedial investigation (RI) at IR Site 25 (an adjacent IR site) suggested PAH contamination at the properties of the WCDC and Miller School (BEI, 2004). Subsequent investigation findings confirmed the presence of PAHs at the site. PAH concentrations, expressed as benzo(a)pyrene (B[a]P) equivalents, were detected above 620 µg/kg at the site during the basewide PAH assessment conducted in 2002 (BEI, 2003a). The concentration value is used as a basewide human-health screening value as agreed to in 2001 (U. S. Department of Navy, 2001).

Unpaved, deteriorating ground covers exist in various locations (particularly in the play areas) on the properties of the WCDC and Miller School. Some of these areas are frequented by the children. As such, before the implementation of the removal action, there was a potential exposure to children, as well as adults, from PAHs in the soil in these areas via direct contact and ingestion of contaminated soil and inhalation of contaminated dust particles. It was, therefore, the main objective of the removal action to eliminate these potential exposure pathways to reduce the potential human health threat at the site. The removal action conformed to the requirements as described in Section 300.415(b)(2) of the NCP (CFR, 2003).

2.3 Physical Location

IR Site 30 is located in the northeastern section of Alameda Point, California. Ground elevation in this region is approximately 10 feet above mean sea level. Surrounding the site are mostly residential dwellings. On the north end of the site is Singleton Avenue, which separates IR Site 30 from IR Site 25. IR Site 31 borders the site on the south and the west (Figure 2).

2.4 Site Characteristics

Most of the site is paved, except for the grassy and play areas within the WCDC and Miller School properties. Beneath the asphalt-concrete pavement is the sand- to silt-dominated artificial fill. PAHs were detected in the fill material at the site during previous investigations. According to available documentation, these PAHs may have originated from former petroleum-related industrial activities, including manufactured-gas plants and refineries, occurring in the region before the Navy occupied Alameda Point in 1936 (BEI, 2004).

Available information suggests that these industries might have released waste, including PAHs, into the San Francisco Bay (now the Oakland Inner Harbor). Because of their physical characteristics, PAHs released into the bay might have been accumulated in sediments. When dredged bay sediments were used as fill material for Alameda Point, the fill material likely contained the PAHs (BEI, 2004). According to historical survey records, fill material was placed in the area where IR Site 30 is located in 1919 and 1930 (US Geological Survey, 1949).

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

Historical site investigations and sampling results have confirmed the presence of PAHs in on-site soil. During an RI conducted at the nearby IR Site 25 in May 2001, analysis of soil samples taken in an area between the WCDC and Miller School showed the presence of PAHs. The results showed fifty percent of the samples analyzed contained PAHs at concentrations above 620 µg/kg (Neptune and Company, Inc., 2002). In a site inspection conducted in 2003 at IR Site 30, soil sampling results identified an area of concern within the IR site where elevated PAH concentrations were found in the previous investigation (BEI, 2003b). In the same year, a PAH-specific assessment performed at 19 IR sites and 3 parcels at Alameda Point confirmed the presence of PAHs in the soil at IR Site 30, with 19 percent of B(a)P equivalent concentrations that were calculated from the site sampling results above 620 µg/kg (BEI, 2003a).

2.6 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 U.S. Environmental Protection Agency (U.S. EPA).

2.7 Status Maps, Pictures, and Other Graphic Representations

The site location and layout are shown in Figures 1 and 2. The removal action areas are shown in Figure 3.

2.8 Other Actions to Date

Other actions conducted to date at the site include the performance of an RI to determine the nature and extent of soil contamination from non-PAH chemical substances and an ongoing investigation of a regional groundwater contamination plume on and off site.

2.9 Federal, State, and Local Authorities' Roles

Alameda Point is a federal facility. Section 120(f) of CERCLA and 10 U.S.C. Section 2705 require that the Navy gives appropriate federal, state, and local officials the opportunity to participate in the planning and selection of remedial actions at Naval facilities. The Navy and U.S. EPA have entered into a Federal Facilities Agreement for Alameda Point. The Navy is the lead agency while the U.S. EPA is the lead regulatory agency. The U.S. EPA reviews and comments on the Navy's CERCLA response activities at Alameda Point. Implementation of this TCRA has been in consultation with the U.S. EPA.

Regulatory oversight of the Navy's environmental restoration program at Alameda Point is also provided by the California EPA (Cal EPA). The Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board, San Francisco Bay Region, of Cal EPA, along with U.S. EPA and the Navy, are members of the Base Realignment and Closure (BRAC) Cleanup Team (BCT), which provides technical input during the planning and implementation of site investigation, feasibility studies, removal actions, and remediation activities. The BCT has been involved in the planning of this TCRA.

Implementation of the TCRA has also been conducted in close coordination with the Alameda Unified School District and the Alameda Point Restoration Advisory Board (RAB). The Alameda Point RAB consists of members of the community who advise the BCT on environmental cleanup issues and strategies for Alameda Point.

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

The following factors, as defined in Section 300.415(b)(2) of the NCP (CFR, 2003), were considered in determining the TCRA for this site:

- Actual or potential exposure of nearby human populations to hazardous substances, pollutants, or contaminants
- Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released

The presence of PAHs in underlying soil in unpaved areas may pose a threat to the human health at WCDC and Miller School within IR Site 30. As such, the Navy and U.S. EPA determined that a TCRA was appropriate for the site pursuant to CERCLA Section 104(a).

4.0 *Endangerment Determination*

The completion of the removal activities prevented an imminent and substantial endangerment to public health or welfare or the environment posed by PAHs in the soil at the site.

5.0 Selected Removal Action and Cost

This section describes the TCRA field activities that were performed at the site from November to December of 2004. It also discusses applicable or relevant and appropriate requirements (ARARs) and the cost incurred.

5.1 Removal Action Description

The primary objective of the TCRA was to reduce the likelihood of human exposure (especially that of children) to PAHs at the WCDC and Miller School via direct contact and ingestion of potentially contaminated soil, as well as inhalation of potentially contaminated dust particles, in unpaved areas. To achieve this key objective, a soil barrier was installed in November 2004 at each of the following locations:

- Two play areas at Miller School
- The grass area at the WCDC
- Three play areas at the WCDC

These removal action areas are shown in Figure 3. In the play areas at Miller School, concrete of approximately 4 inches in thickness was installed as the soil barrier over the entire play area in each location.

At the WCDC, the following soil barriers were installed:

- Over the entire grass area and the rectangular play areas, a synthetic turf suitable for outdoor uses, along with a water permeable liner, were installed as the soil barrier. Where synthetic turf could not be properly installed around existing trees because of exposed tree roots, redwood planter boxes were built around each tree, lined with filter fabric as a soil barrier, and half-filled with woodchips. In the rest of the play areas, wood chips were placed on top of the soil barriers up to levels that matched with the pre-construction conditions.
- In the circular play area, one half of the area was filled with concrete as a soil barrier. The other half was completed with a water permeable soil barrier covered by clean sand.

Associated on-site removal activities conducted include surface preparation of the areas for the installation of the soil barriers, dust monitoring during surface preparation, and site restoration. To minimize impacts to the operations at Miller School and the WCDC, some of the activities were performed after normal business hours.

5.2 Contribution to Remedial Performance

Installation of the soil barriers at these two facilities mitigated the potential for direct contact and ingestion of soil, and/or inhalation soil particulates, thus reducing the potential health risk of exposure to PAHs at the site.

5.3 Description of Other Removal Action Alternatives

The other removal action alternative considered was the no-action alternative. Although this alternative involved no cost to implement, it would not prevent the children as well as adults from being potentially exposed to the PAHs in the soil at the site. As such, the potential human health exposure risk would remain. Therefore, this alternative was determined to be ineffective in the protection of human health and, therefore, considered not applicable for the site.

5.4 Engineering Evaluation/Cost Analysis

An Engineering Evaluation/Cost Analysis is not required for a TCRA.

5.5 Applicable or Relevant and Appropriate Requirements

Section 300.415(j) of the NCP states that removal actions must attain ARARs to the extent practicable considering the exigencies of the situation. Additionally, Section 300.415(j) of the NCP states that the lead agency may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted when determining whether compliance with ARARs is practicable.

There are three types of ARARs – chemical-specific, location-specific, and action-specific. The chemical-specific ARARs set limits on concentrations of specific hazardous substances, contaminants, and pollutants in the environment. The location-specific ARARs set restrictions on certain types of activities based on site location and its characteristics, such as wetlands, floodplains, and historic sites. The action-specific ARARs are technology-based restrictions that are triggered by the type of action under consideration.

Because CERCLA on-site response actions do not require permitting in accordance with 40 CFR 300.400(e), only substantive requirements are considered as possible ARARs. Administrative requirements such as approval of, or consultation with, administrative bodies; documentation; reporting; record keeping; and enforcement are not ARARs for CERCLA actions confined to the site. Only those state standards that are identified by a state in a timely manner and are more stringent than federal requirements may be applicable or relevant and appropriate.

As the lead federal agency, the Navy evaluated the ARARs for the removal action. Since this TCRA involved mainly on-site installation of soil barriers to address the risk of potential exposure to PAH in the soil, there were no chemical-specific ARARs required to be addressed.

There are no known habitats of federal or state listed endangered or threatened species at this site. The site is also not located in any sensitive environments (i.e., wetlands and floodplains); nor is it not a historic site. Therefore there were no location-specific ARARs imposed on the site.

There are no federal or state regulations or regulatory standards that govern the installation of soil barriers (i.e., concrete, sand, synthetic turf, as well as wood chips) in the play areas at the site. However, dust emissions from earth movement, including during surface preparation for soil barriers, are subject to the limits established by the Bay Area Air Quality Management District under Regulation 6. This regulation is part of the State Implementation Plan, and the substantive requirement in this regulation is considered an action-specific ARAR for this removal action.

5.6 Project Schedule

Field implementation of the removal action commenced on November 18, 2004 and concluded in mid-December 2004. A removal action report will be prepared 60 days after the completion of all TCRA-related field activities, including site restoration.

5.7 Cost

The cost incurred in the implementation of the TCRA was approximately \$350,000, which included planning, materials procurement, site preparation, soil barrier installation, and site restoration.

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

This section is not applicable since the TCRA was already performed as of mid-December 2004.

7.0 Public Involvement

The Navy published a fact sheet in August 2004 informing local communities of the TCRA and briefly described the purpose and scope of the removal action. Copies of this Action Memorandum and the Administrative Record were made available for public review and information for 30 days at the main branch of Alameda Public Library and Alameda Point Repository in Alameda, California. Other records made available for public review and information are listed in Appendix A. A public notice was prepared and published in the Alameda Times-Star, the parent paper Oakland Tribune, and the Alameda Journal to announce the availability of this Action Memorandum for review. No comments were received during this 30-day review period.

This Action Memorandum has incorporated pertinent comments received from the BCT. A copy of the Navy's responses to regulatory comments is included as Appendix B, "Response to Regulatory Comments."

8.0 Outstanding Policy Issues

No outstanding policy issues are associated with this site.

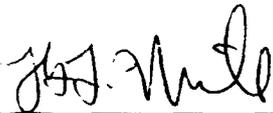
9.0 Recommendation

The Action Memorandum was prepared in accordance with current U.S. EPA and Navy guidance documents for time-critical removal actions under CERCLA. The purpose of this Action Memorandum was to identify and select the most appropriate alternative to mitigate the risk of potential human health exposure to PAHs at IR Site 30 at Alameda Point in Alameda, California. Two alternatives were identified and evaluated:

- No action
- Installation of soil barriers

Based on the analysis of the two alternatives, the recommended removal action was the installation of soil barriers. This alternative was recommended because it would provide the removal of exposure pathways posed at the site, which was the primary removal action objective for reducing the potential threat of exposure to human health via direct contact, ingestion, and inhalation of PAH-contaminated soil particles. The no-action alternative would not meet this removal action objective.

This decision document represents the selected removal action for IR Site 30 at Alameda Point, Alameda, California developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the administrative record for the site.



Thomas Macchiarella
Alameda BRAC Environmental Coordinator
Base Realignment and Closure
Program Management Office West

Date: 7/27/05

10.0 References

Bechtel Environmental, Inc., 2003a, *Preliminary Draft Field Activity Report, Assessment of PAH Contamination at Selected CERCLA Sites and EBS Parcels, Alameda Point, Alameda, California*, December.

Bechtel Environmental, Inc., 2003b, *Draft Site Inspection Report Transfer Parcels EDC-12, EDC-17, PBC-3, EDC-21, and EDC-5, Alameda Point, Alameda, California*, March.

Bechtel Environmental, Inc., 2004, *Polynuclear Aromatic Hydrocarbon Summary Report, Transfer Parcels PBC-3 (IR Site 30) and EDC-21 (IR Site 31), Alameda Point, Alameda, California*, August.

Code of Federal Regulations, 2003, *National Oil and Hazardous Substances Pollution Contingency Plan, Title 40, Part 300*, July 1 (Revised).

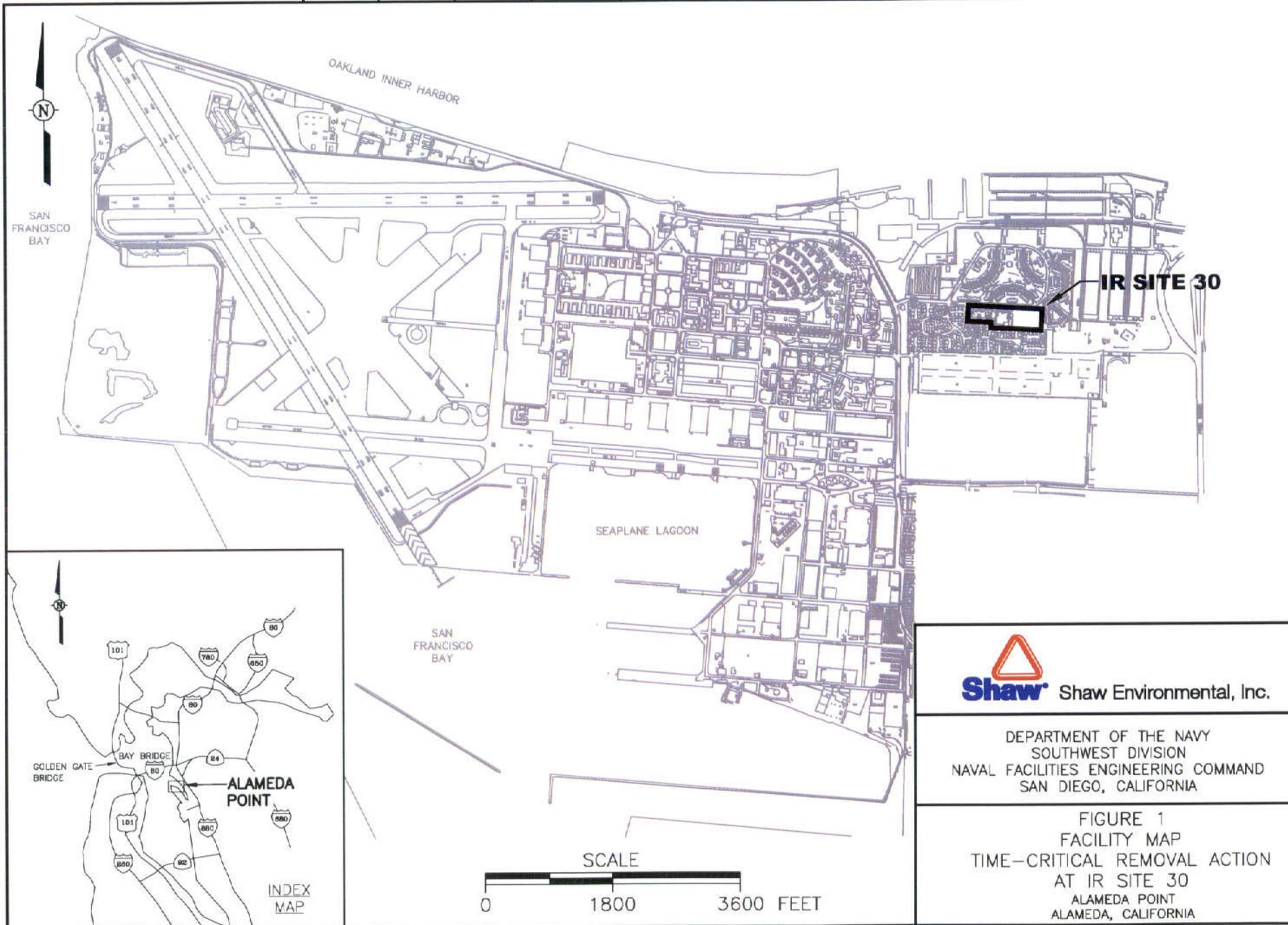
Neptune and Company, Inc., IT Corporation, and Environ, 2002, *Draft Final Operable Unit 5 Remedial Investigation Report, Alameda Point, Alameda*, July 12.

U.S. Department of Navy, Southwest Division, Naval Facilities Engineering Command, 2001, *Draft Meeting Minutes for PAH Technical Meeting with Navy, City of Alameda, and Regulatory Agencies*, May 31.

U.S. Geological Survey, 1949, 1959 (Photo Revised 1968 and 1973), 1980a, 1980b, 1980c, and 1980d; U.S. Coast Geodetic Survey 1859, 1903, 1919, 1927, 1930, and 1941; Oakland Port of Board Commissioners, 1936 and 1945.

Figures

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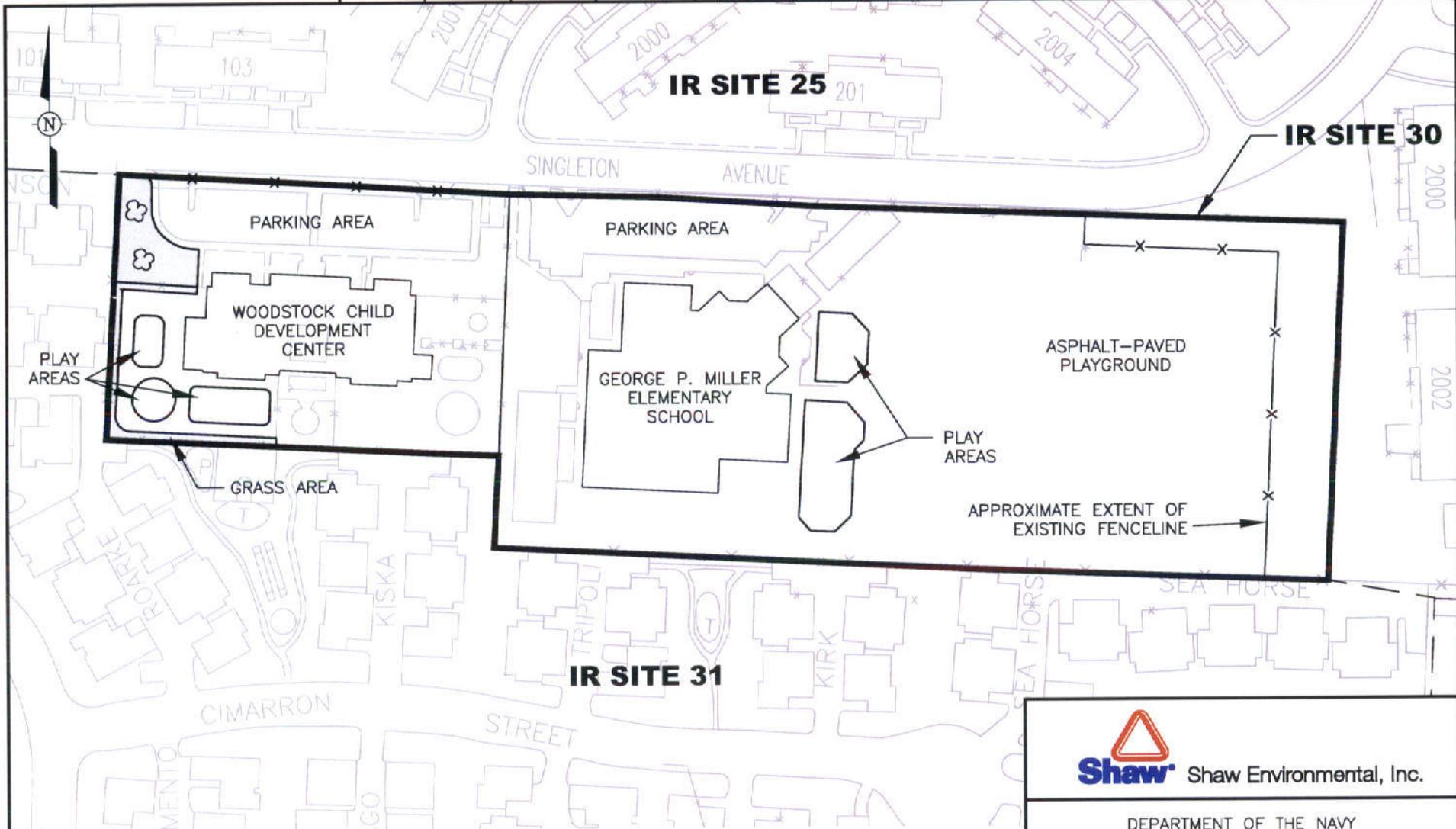


 Shaw Environmental, Inc.

DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
SAN DIEGO, CALIFORNIA

FIGURE 1
FACILITY MAP
TIME-CRITICAL REMOVAL ACTION
AT IR SITE 30
ALAMEDA POINT
ALAMEDA, CALIFORNIA

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
---	ALA1BASE	CONC	SJZ	1/31/05	CS	1/31/05	JM	1/31/05	844918-A26



LEGEND

-  IR SITE 30 BOUNDARY
-  OTHER IR SITE BOUNDARY
-  TREE/SHRUB AREA
-  EXISTING FENCING

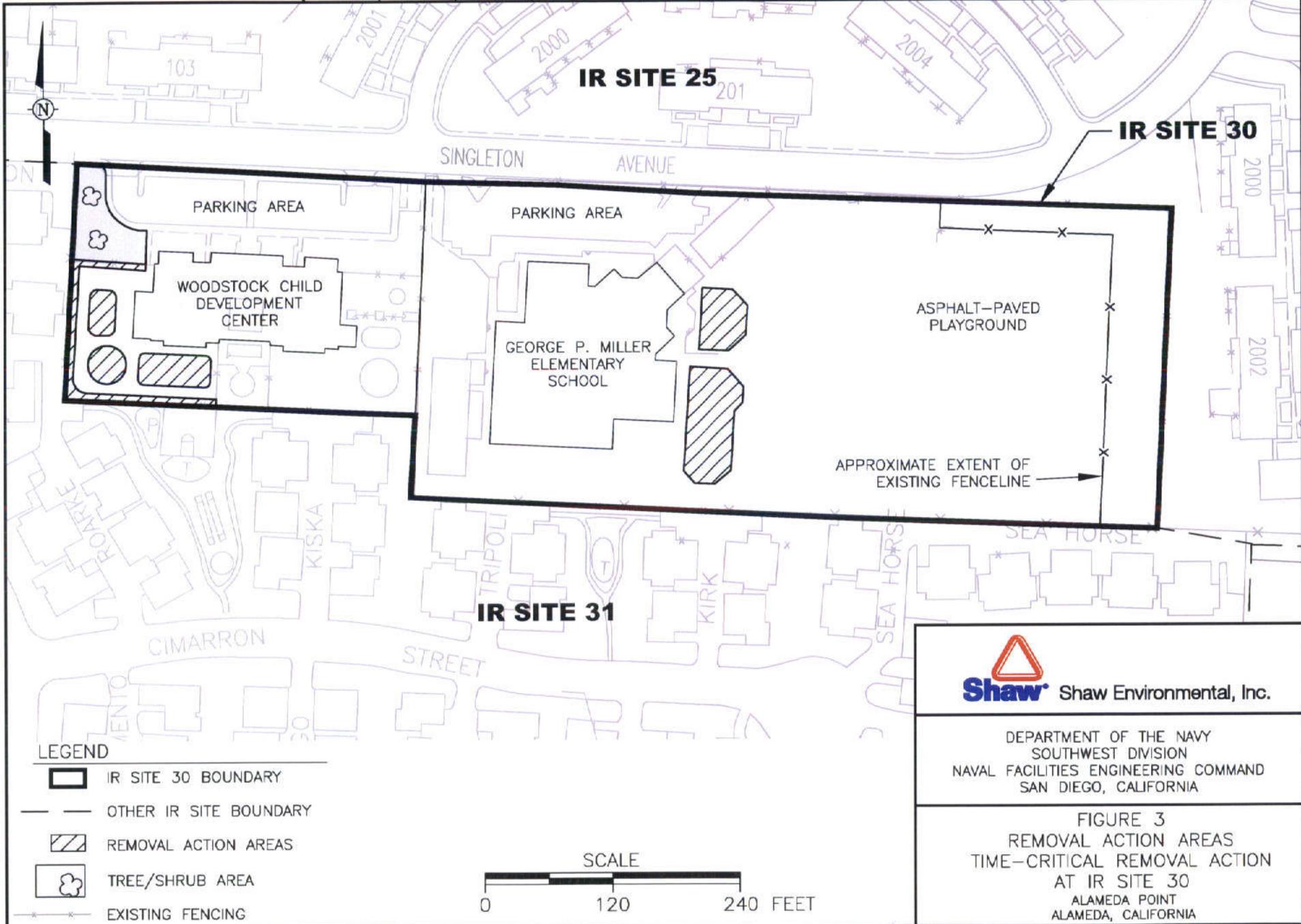


 **Shaw** Shaw Environmental, Inc.

DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
SAN DIEGO, CALIFORNIA

FIGURE 2
SITE LAYOUT MAP
TIME-CRITICAL REMOVAL ACTION
AT IR SITE 30
ALAMEDA POINT
ALAMEDA, CALIFORNIA

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
---	AL99BASE	CONC	BJ	1/11/05	CS	1/11/05	JM	1/11/05	844918-A27



Appendix A
Draft Administrative Record File Index

ALAMEDA POINT NAS

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

DOCUMENTS RELATED TO IR SITE 30

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 FRC Access. No. Box No. CD No.
N00236 / 000502 CTO-0059/0010 & SWD-V SWD V 06CA.GC/0840 PLAN PLAN N68711-95-D-7526 00150	06-03-2003	BECHTEL	DRAFT WORK PLAN FOR ASSESSMENT OF	ADMIN RECORD	B(A)P	003	FRC - LAGUNA
	05-19-2003	ENVIRONMENTAL, INC.	POLYNUCLEAR AROMATIC HYDROCARBONS (PAH) CONTAMINATION AT SELECTED CERCLA SITES AND EBS PARCELS [INLCUDES SWDIV	CONFIDENTIAL	DCE	004	NIGEL 181-03-0188
	00059	E. JOHANSEN NAVFAC - NAVFAC - SOUTHWEST DIVISION	TRANSMITTAL LETTER BY G. CLARK] (PORTION OF MAILING LIST IS CONFIDENTIAL}		INFO REPOSITORY	MTBE	005 181-03-0188
					PAH	006	
					PCB	007	
					SVOC	008	
					TCE	009	
					TPH	010	
					VOC	011	
						012	
						013	
						016	
					019		
					021		
					022		
					023		
					030		
					031		
					032		
					PARCEL 205		
					PARCEL 28		
					PARCEL 51		

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N00236 / 000772 FRC - LAGUNA NONE	08-04-2003	NAVFAC -	ALAMEDA POINT FOCUS ENVIRONMENTAL JULY			ADM:IN RECORD	001
MISC	07-01-2003	SOUTHWEST DIVISION	2003 NEWSLETTER			002	NIGEL 181-33-0188
NONE 00016	NONE	M. MCCLELLAND GENERAL PUBLIC				003	181-33-0188
						004	
						005	
						006	
						007	
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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 FRC Access. No. Box No. CD No.
N00236 / 001812 CTO-0059/0127 RPT	04-22-2004 03-30-2004 00059	BECHTEL ENVIRONMENTAL, INC. E. JOHANSEN NAVFAC - NAVFAC - SOUTHWEST DIVISION	FIELD ACTIVITY REPORT ASSESSMENT OF POLYNUCLEAR AROMATIC HYDROCARBONS (PAH) CONTAMINATION AT SELECTED CERCLA SITES AND EBS PARCELS, [INCLUDES SWDIV	ADMIN RECORD CONFIDENTIAL	PAH PCB	003 004 INFO REPOSITORY	SOUTHWEST DIVISION 005
N68711-95-D-7526 00120 00120			TRANSMITTAL LETTER BY T. MACCHIARELLA] (PORTION OF MAILING LIST IS CONFIDENTIAL)			006 007 008 009 010 011 012 013 016 019 021 022 023 030 031 032 PARCEL 205 PARCEL 28 PARCEL 5'	
N00236 / 001884 SWDIV SER DIVISION 06CA.DN/0739 06CA.DN/0739 LTR NONE 00003	10-20-2004 07-19-2004 NONE	NAVFAC - SOUTHWEST DIVISION T. MACCHIARELLA U.S. EPA - SAN FRANCISCO A. COOK	TRANSMITTAL OF DRAFT WORK PLAN FOR REMEDIAL INVESTIGATION (DOCUMENT WAS NOT SUBMITTED TO ADMINISTRATIVE RECORDS)	ADMIN RECORD		030	SOUTHWEST INFO REPOSITORY
N00236 / 001873 TC.B010.10260 DIVISION RPT N62474-03-D-5104 00020	09-27-2004 07-20-2004 00013	SULTECH NAVFAC - SOUTHWEST DIVISION	BRAC CLEANUP TEAM (BCT) MONTHLY TRACKING MEETING AFTER ACTION REPORT - INCLUDES AGENDA, 15 JUNE 2004 MEETING MINUTES AND VARIOUS HANDOUTS	ADMIN RECORD	GW INFO REPOSITORY PAH REPORT SOIL	030 MTG MINS	SOUTHWEST PARCEL 5

Appendix B
Response to Regulatory Comments

Response to Comments on the Draft Action Memorandum, Time Critical Removal Action at IR Site 30 (Miller School/Woodstock Child Development Center), Alameda Point, Alameda, California, dated March 7, 2005, Document Control Number 9006

Comments by: Anna-Marie Cook, Remedial Project Manager, Comments dated April 12, 2005

Specific Comments

Comment No.	Page No.	Section, Figure, Table	Comments	Response
1	2-1	2.2	1st Paragraph, Last Sentence: Reword to read "The concentration value is used as a basewide human-health screening value as agreed to in 2001 (U.S. Department of Navy, 2001)."	The sentence will be changed accordingly in the Draft Final Action Memorandum.
2	2-1	2.2	2nd Paragraph, Second Sentence: Remove the word "mostly." 3rd Sentence: Reword to read "As such, before the implementation of the removal action, there was potential exposure to children, as well as adults, from PAHs in the soil..."	The sentence will be changed accordingly in the Draft Final Action Memorandum.
3	2-3	2.8	Replace "contamination by non-PAH chemical substances" with "contamination from non-PAH chemical substances."	The sentence will be changed accordingly in the Draft Final Action Memorandum.
4	2-3	2.9	1st Paragraph, 1st Sentence: Reword to read "Alameda Point is a federal facility."	The sentence will be changed accordingly in the Draft Final Action Memorandum.
5	2-3	2.9	2nd Paragraph, 1st Sentence: Replace the word "concurrence" with "oversight." 2nd Sentence: Remove "concurrence."	The sentence will be changed accordingly in the Draft Final Action Memorandum.

Response to Comments on the Draft Action Memorandum, Time Critical Removal Action at IR Site 30 (Miller School/Woodstock Child Development Center), Alameda Point, Alameda, California, dated March 7, 2005, Document Control Number 9006

Comments by: Anna-Marie Cook, Remedial Project Manager, Comments dated April 12, 2005

General Comments

Comment No.	Page No.	Section, Figure, Table	Comments	Response
6	N/A	N/A	EPA regulations require that the Navy take public comment based on the administrative record within 60 days of the initiation of the fieldwork. This action memorandum is a key component of the administrative record and should have been available for public comment as of January 18, 2005.	Comment noted.
7	N/A	N/A	In the ARARs discussion, page 5-3, it states that there are no action-specific ARARs, although previously on page 5-1, it is stated that dust monitoring was performed. It seems that the dust-suppression ARARs from the BAAQMD regulations should apply. Under location-specific ARARs, same page, there is no discussion about whether there are any endangered species in the area that would trigger ESA.	BAAQMD Regulation 6 pertaining to visible emissions standards are applicable and will therefore be included as an action-specific ARAR for the removal action. There are no known habitats of federal or state-designated endangered or threatened species at the site. This statement will be added to the Draft Final Action Memorandum.