



## Department of Toxic Substances Control



Alan C. Lloyd, Ph.D.  
Agency Secretary  
Cal/EPA

700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721

Arnold Schwarzenegger  
Governor

August 26, 2005

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

### DRAFT PROPOSED PLAN, IR SITE 26, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Proposed Plan for Site 26 dated June 20, 2005. Below are our comments.

BRAC OFFICE

1. **RCRA Corrective Action:** Please discuss the status of RCRA corrective action in the Proposed Plan. Please submit relevant closure information for Solid Waste Management Units (SWMUs) located at Site 26 as a supporting document.
2. **Site 26 Soil:** DTSC appreciates Navy's email responses on April 12, 2005, April 15, 2005 and April 18, 2005 regarding previous DTSC comments on Site 26 soil (see DTSC correspondence dated December 5, 2003). We will evaluate the responses in conjunction with the SWMU information and make the determination expeditiously.
3. **Areas to be cleaned up under different programs:** For clarity please explain in this Proposed Plan that 1) the fuel hydrocarbons in soil and groundwater southwest of Building 23 is being addressed under the Alameda Point total petroleum hydrocarbons program, and 2) the storm sewers between Building 23 and 24 are being addressed as part of neighboring Site 5. Please clarify if the petroleum plume currently being remediated as part of the Corrective Action Area 6 (CAA-6) extends beneath Site 26.
4. **Sewer Near Building 20:** The 2001 sewer study recommends that two sewer segments near Building 20 be repaired to prevent infiltration of contaminated groundwater. Please clarify if this repair will be conducted as part of the final remedy.

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5. **Plume Delineation:** As noted previously in DTSC comments (see DTSC correspondences dated May 13, 2003, September 5, 2003, and December 5, 2003), DTSC is concerned that permanent monitoring wells have not been constructed at the site and that groundwater flow conditions and plume movement have not been monitored. In addition, DTSC does not agree that it has been demonstrated that the FWBZ (first water bearing zone) is underlain by a clay aquitard in the vicinity of Building 20 and questions whether the vertical extent of contamination has been delineated. It appears that VOC concentrations increase with depth in this area.

DTSC requests that: 1) Data gap sampling is conducted at the remedial design phase to include delineation of the horizontal and vertical extent of contamination to levels that are consistent with remediation goals; 2) Permanent monitoring wells are constructed to monitor groundwater flow conditions, plume movement, and remediation progress; and 3) Appropriate language is included in the Proposed Plan to reflect this approach, i.e. pre-design data gap sampling.

6. **Groundwater Remediation Performance Standard:** The Proposed Plan indicates Navy's preferred groundwater remedial alternative is full-scale in-situ chemical oxidation (ISCO) and in-situ bioremediation (ISB) combined with implementation of three years of institutional controls (IC). Please be advised that DTSC considers three years of IC hypothetical and requests performance criteria be established prior to the signing of Record of Decision (ROD) to allow the determination of end points for ISCO, ISB and IC. The criteria, in our opinion, should specify the target concentrations for groundwater and saturated soil on which the treatment and IC could be terminated and groundwater monitoring could be commenced. Please include appropriate language in the Proposed Plan to reflect this approach, i.e. formulating performance standard in the ROD.
7. **RAOs and PRGs:** Please provide remedial action objectives (RAOs) in the Proposed Plan. Please clarify the difference between RAOs and PRGs (preliminary remediation goals). Also, since most people understand PRGs as the screening values published by the EPA, please consider the use of technical terms other than PRGs to avoid confusion. Please include the term of choice in the glossary (currently the term PRG is not in the glossary).
8. **Public Participation Comments:** Please refer to the attached comments from DTSC Public Participation Unit. The electronic version of these comments was previously transmitted on July 29, 2005.

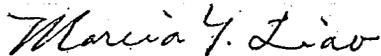
Mr. Thomas L. Macchiarella

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DTSC appreciates the opportunity to comment on the Proposed Plan for Site 26. If you have any questions regarding our comments, please do not hesitate to contact me at 510-540-3767 or [mliao@dtsc.ca.gov](mailto:mliao@dtsc.ca.gov).

Sincerely,



Marcia Liao  
Remedial Project Manager  
Office of Military Facilities

Attachment

cc: Greg Lorton, SWDiv  
Glenna Clark, SWDiv  
Anna-Marie Cook, EPA  
Judy Huang, RWQCB  
Elizabeth Johnson, City of Alameda  
Peter Russell, Russell Resources  
Jean Sweeney, RAB Co-Chair  
Arc Ecology



## Department of Toxic Substances Control



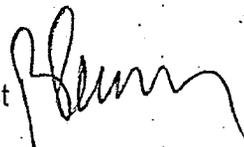
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**TO:** Marcia Liao, Project Manager  
Office of Military Facilities  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710

**Via:** Diane Fowler  
Supervisor, Public Participation Unit

**FROM:** Richard A. Perry, Public Participant Specialist 

**DATE:** July 29, 2005

**SUBJECT:** Comments on the Draft Proposed Plan for Groundwater, Western Hanger Zone, Installation Restoration Site 26, Alameda Point, California

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### General Comments:

The Navy should move away from the deep science style of writing for the interested and affected community review. Although, there are some who will follow the explanation given by the Navy, most in the targeted audience are not capable of reading and asking questions based upon the documents provided for review. The Navy should make every attempt to reach as many people as possible with their fact sheets; the sophisticated community will have no problem following along. These comments mirror those from the previous review of Site 25.

### Specific Comments:

Page 1

- 1) The title is long and cumbersome; suggest something such as, Groundwater Recommendations for Site 26 Remediation.
- 2) Page one is far too busy listing Key Items Inside, Public Notice box and dual titles describing the work to be and already completed.
- 3) Highlighted items are not adequately defined before they are being used as explanations for activity. Words should be defined in the Glossary or prior to first use in the text.

4) Reduce the number of items listed as "Key Items", it should not be used as a Table of Contents.

Page 2

5) Paragraph two states "investigations include a remedial investigation (RI) for soil and groundwater..." with the final sentence of the second paragraph stating "Soil at the site does not require any further action." An explanation why the soils at site 26 require no further action should be included.

6) Figure 1. "Vicinity Map" is far too small in scale and does not adequately show Alameda Point. A smaller map with more detail and less overview of the Bay Area would show the site clearer.

7) Figure 2. "Site Location Map" is too large showing the entire former Naval Air Station with a small area drawn to show Site 26. Too Busy not enough detail. This map could be half or 1 quarter the size of current map leaving room for information.

8) The first sentence is not needed as the Proposed Plan gives more than adequate information on the review and comment on this Plan and should be removed.

9) Site Background. This paragraph tells when Alameda Point was shut down not the NAS. Correct Alameda Point with NAS Alameda for proper historical perspective.

10) Site Background "site investigations and remediation are underway." This paragraph fails to give information on when and what site remediation has been and is ongoing and should be moved to the back of the document in order to highlight more important information.

11) Paragraph four needs spacing corrected.

Page 3

12) Figure 3 is too large and the field is out of scale to show accurate size and position of the VOC concentration in shallow groundwater.

Page 4

13) The description of Risk and its assessment is written at a grade level far beyond that of the intended community and it is too long.

Page 5

14) The use of mathematical equation to express lesser than, equal to or greater than is beyond the scope of the intended audience. Simple sentences explaining the chance of becoming ill or property becoming contaminated would be easier to read and understand. Both Table 2 and Table 3 do not offer understandable information, a written explanation of what is being expressed would be simpler.

15) The final 2 sentences of the last paragraph are very difficult to follow. Suggest rewriting.

Page 6

16) This page conveys a lot of information, placing the remediation options in a readable fashion. The one point I would make is Figure 4 would read easier if the table was turned 90 degrees left with the Table Heading still at the top of the graphic. Alternative numbers would also have to be turned to be readable in this configuration.

17) Summary of Ground Water Alternatives. There is no reason for the opening paragraph. Save space by deleting introductory text.

18) Remedial Action. Why is the cost the same for RA3 as that for RA4? There are more activities to be completed in RA4 but it is shown as costing the same. How are these figures being determined?

Page 7

19) As found in my comments on Site 25, there is no reason for the ARARs and should be removed for creation of more space.

20) Preferred Alternative. This subject appears in two separate places on page ten and should be combined to prevent redundancy and to make space.

cc:

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