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ALAMEDA POINT  
SSIC NO. 5090.3



## Department of Toxic Substances Control



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

8800 Cal Center Drive  
Sacramento, California 95826-3200

Arnold Schwarzenegger  
Governor

October 19, 2005

Mr. Luciano A. Ocampo, PE  
Remedial Project Manager  
Department of the Navy  
Base Realignment and Closure  
Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, California 92108-4310

### **SCREENING ECOLOGICAL RISK ASSESSMENT REMARKS FOR THE INDUSTRIAL WASTE TREATMENT PLANT (IWTP) 32, NAVAL AIR STATION, ALAMEDA, CALIFORNIA, EPA ID # CA 2 170 023 236**

Dear Mr. Ocampo:

The Department of Toxic Substances Control's (DTSC) Human and Ecological Risk Division (HERD) have reviewed the Screening Ecological Risk Assessment (SLERA) found in the Final Closure Report for the Industrial Waste Treatment Plant (IWTP) 32 dated June 20, 2005. Comments on the SLERA are provided in the attached memorandum dated September 19, 2005. The comments do not require a response from the Navy and no change to the approved IWTP 32 Closure is necessary. If you have any questions or comments concerning this letter please contact me at (916) 255-6528.

Sincerely,

Dean Wright  
Standardized Permitting and Corrective Action Branch

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cc: Thomas M  
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Mr. Louciano Ocampo  
October 19, 2005  
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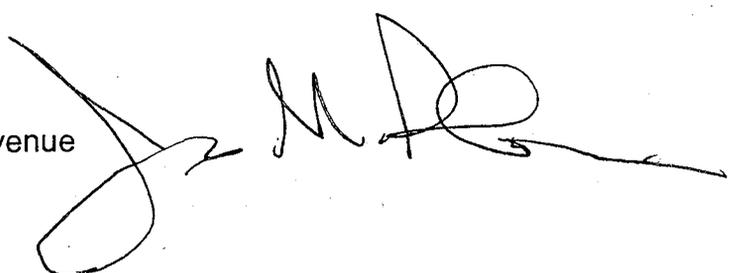
### MEMORANDUM

TO: Dean Wright, DTSC Project Manager  
Facilities Permitting Branch  
8800 Cal Center Drive  
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FROM: James M. Polisini, Ph.D.  
Staff Toxicologist, HERD  
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DATE: September 19, 2005

SUBJECT: NAVAL AIR STATION ALAMEDA (ALAMEDA POINT),  
INDUSTRIAL WASTE TREATMENT 32 FINAL CLOSURE  
REPORT, ECOLOGICAL RISK ASSESSMENT  
[SITE 200004-33-PCA 25045 MPC 06 H:8]



### BACKGROUND

HERD reviewed the document titled *Final Closure Report, Industrial Waste Treatment Plant 32, Hazardous Waste Facility Permit CA 2170023236, Naval Air Station, Alameda, California*, dated June 20, 2005. The submitted document was prepared by Shaw Environmental, Inc. of Concord, California.

Industrial Waste Treatment Plant (IWTP) 32 is located in the central section of Alameda Point in the western section of Building 32. Building 32 is a 34,500 square foot structure specifically designed to house plating shop and waste processing operations. Containment barriers were designed into Building 32 during construction. As part of the secondary containment, a 60-mil synthetic liner underlies the entire floor (ground and basement), the two-foot-thick reinforced concrete ground and basement floors are sealed with epoxy resin coating and all process and waste conveyance piping were installed above ground. Building 32 lies in the northeast boundary of Installation Restoration (IR) Site 5.

Wastewater generated in Building 32 operations contained aluminum, cadmium, chromium, copper, cyanide, lead, nickel, silver, tin and zinc. Wastewater was treated in

batches. Hazardous waste sludge precipitated from the wastewater was dewatered and disposed of off site. The treated effluent was discharged under permit to the East Bay Municipal Utility District wastewater treatment plant. Approximately 9,190 lineal feet of waste conveyance piping, weighing approximately 55.7 tons were removed and transported to the Chemical Waste Management – Kettleman Hills Facility for disposal using macro-encapsulation techniques. Under agreement with DTSC, some of the tanks present in the basement of IWTP 32 were rendered unusable in lieu of removal by cutting four 1-foot by 1-foot holes in each side. DTSC reportedly inspected the facility on April 21, 2004 and noted no additional closure requirements were identified.

NAS Alameda was an active naval facility from 1940 to 1997. Operations included aircraft, engine, gun and avionics maintenance; fueling activities; and metal plating, stripping and painting. Linked storm water and industrial wastewater lines discharged to the Seaplane Lagoon in the Northwest and Northeast corners, as well as the Oakland Inner Harbor Channel side of NAS Alameda.

### **GENERAL COMMENTS**

Based on the material presented, closure activities at IWTP 32, coupled with the construction safeguards and operational procedures, appear to have resulted in conditions where the IWTP soils do not pose an ecological hazard for terrestrial receptors.

This memorandum addresses only ecological hazard. Review of the Human Health Risk Assessment (HHRA) issues were previously presented in a separate memorandum from Dr. Loveriza Sarmiento, HERD Staff Toxicologist.

### **SPECIFIC COMMENTS**

1. Groundwater exposure not evaluated because groundwater contamination with Volatile Organic Compounds (VOCs) are attributed to an adjacent Installation Restoration (IR) Site 5 (Section 3.1, page 3-2). IR Site 5 groundwater is being investigated as part of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) as amended by the Superfund Amendment and Reauthorization Act (SARA).
2. Comparison to background soil concentrations, and the potential adverse ecological effects associated with intake at background concentrations, is a significant component of the terrestrial Screening Ecological Risk Assessment (SLERA) (Section 7.3, pages 7-5 through 7-7). The conclusion of the terrestrial SLERA is that intake of inorganic elements, based on IWWTP 32 soil samples, is not significantly different from intake of inorganic elements based on background soil concentrations and, therefore, there is no incremental ecological hazard associated with the remaining IWWTP soil concentrations.

HERD is currently evaluating the proposed soil background data sets designated as the 'pink', 'blue' and 'yellow' data sets based on the historical period of fill operations which created NAS Alameda. IWTP 32 is located in the area of placed fill designated as 'pink'. HERD has preliminarily determined that several of the 'pink' background soil samples are not representative of an unimpacted condition and should be removed from the 'pink' background data set. However, based on this preliminary evaluation of the 'pink' proposed background data set, only copper (38.7 mg/kg) in soil sample IWTP32-0-61 (surface to 1 foot below surface) would exceed any revised 'pink' background value. This sample is clearly identified in the Final Closure Report SLERA as exceeding background (Table 4). HERD agrees that one sample, out of twelve soil samples, exceeding copper background soil concentrations; with the remaining eleven samples ranging from 3 mg/kg to 12.7 mg/kg, is not indicative of a significant ecological hazard.

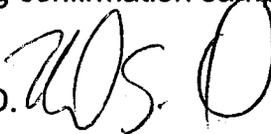
3. Volatilization from groundwater impacted by VOCs from IR Site 5, apparently followed by deposition in overlying IWTP 32 soils, is proposed as a possible mechanism for low soil VOC concentrations at IWTP 32 (Section 5.2, page 5-3). Cyclical changes of groundwater elevation, perhaps due to infiltration during rain events or tidal action, which brought groundwater briefly into contact with IWTP 32 soils would seem a more likely mechanism. This comment is meant for the DTSC Project Manager and no response, or change, is required by the Navy or Navy contractor.

### CONCLUSIONS

HERD agrees with the conclusion that the Screening Ecological Risk Assessment (SLERA) indicates that Industrial Waste Treatment Plant (IWTP) 32 soils pose minimal, if any, significant ecological hazard. This conclusion is based on:

1. Any potential ecological hazard associated with groundwater contamination is being addressed as part of the Installation Restoration (IR) Site 5 investigation; and,
2. IWTP soil confirmation samples indicate only copper in one sample exceeds the probable 'pink' fill event soil background concentration by a minimal amount, while copper concentrations in the remaining confirmation samples are significantly lower.

HERD Internal Review: Michael Anderson, Ph.D.  
Staff Toxicologist



cc: Ned Black, Ph.D., BTAG Member  
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September 19, 2005  
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