



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



Department of Toxic Substances Control

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

N00236.002186
ALAMEDA POINT
SSIC NO. 5090.3



Arnold Schwarzenegger
Governor

December 16, 2005

Mr. Thomas L. Macchiarella, Code BPMOW.TLM
Department of The Navy
Base Realignment and Closure Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

DRAFT PROPOSED PLANS, IR SITE 28, TODD SHIPYARD, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the draft Proposed Plan (PP) for IR Site 28 dated September 2005 in conjunction with Navy's responses to DTSC comments on the Remedial Investigation (RI) and Feasibility Study (FS) conducted at the subject site. Below are our comments. Please note that this review does not include evaluation of solid waste management unit (SWMU) since there is no SWMU identified at IR 28.

1. **Remedial Action Objectives:** Please provide the basis for the remedial action objectives (RAOs) listed in the PP (page 6).
2. **RAO for Arsenic in Soil:** The proposed RAO for arsenic in soil is 9.1 mg/kg which appears to be the 95 percentile for arsenic at the pink area of Alameda Point, rather than 95 percent upper confidence limit (UCL) as the FS has stated (FS page 3-14). Please clarify.

Furthermore, the Alameda Point soil background concentrations have yet to be completely reviewed and finalized. This could impact the arsenic cleanup level. Please acknowledge it in the PP.

3. **RAO for PAHs in Soil:** The proposed RAO for polynuclear aromatic hydrocarbons (PAHs) in soil is 2.1 mg/kg of benzo(a)pyrene (BaP) equivalent which is the USEPA industrial preliminary remediation goal (PRG) adjusted to

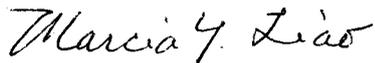
- 10^{-5} cancer risk. DTSC agrees that BaP equivalent concentration in soil of 2.1 mg/kg is appropriate as long as means of assurance that 2 feet of clean soil (defined as < 0.62 mg/kg of BaP equivalent) will remain in place. Please specify this in the PP.
4. **RAO for Lead in Soil:** The proposed RAO of 800 mg/kg for lead is the USEPA industrial PRG for adults which may not be appropriate for certain types of recreational land uses (e.g. playground). Please point out this restriction in the PP and make sure appropriate land use control (LUC) measures will be established in the Record of Decision (ROD).
 5. **RAO for Nickel, Zinc and Mercury in Groundwater:** Since there is no established Alameda Point background groundwater concentrations, RAOs should also be determined for nickel, mercury, and zinc. These metals were reported in groundwater at concentrations exceeding California Toxics Rule (CTR) but were screened out of the FS because of being within the Alameda Point "background" range (see page 3-16 of the FS).
 6. **Proposed Soil Remediation Area:** Please provide a map in the PP to illustrate the areas where the soil will be remediated.
 7. **Point of Compliance:** As stated in our comments to the draft final FS dated June 27, 2005, DTSC disagrees that the point of compliance for metals in groundwater is in the receiving surface water. We also disagree that the existing shoreline wells should be used as the point of measurement for monitoring. DTSC request that the Navy install guard wells and monitor groundwater discharges closer to the shoreline.
 8. **End Point Determination:** The duration of groundwater monitoring for the preferred alternative is assumed to be five years according to the FS (page ES-27). Such duration may fall short of what it really entails. DTSC requests that the PP and/or the Record of Decision (ROD) specifies the end point determination of success (e.g. achieving the RAOs) and discusses contingencies for failure.
 9. **Storm Drain:** It has been verified that storm drains with outfalls into Oakland Inner Harbor intersect contaminated groundwater at IR Site 28. The PP should acknowledge it and explain how the Navy plans to assess the potential impact on offshore sediment at the storm drain outfalls (particularly City Outfall East).

Additional comments from DTSC Public Participation Unit will be forwarded under a separate cover. If you have any questions regarding our comments, please do not

Mr. Thomas L. Macchiarella
Page 3 of 3
December 16, 2005

hesitate to contact me at 510-540-3767 or mliao@dtsc.ca.gov.

Sincerely,



Marcia Liao
Remedial Project Manager
Office of Military Facilities

Cc (via US Mail and email):

Ms. Anna-Marie Cook (cook.anna-marie@epa.gov)
Remedial Project Manager
US Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Ms. Judy Huang (ichuang@waterboards.ca.gov)
Regional Water Quality Control Board
1515 Clay St., Suite 1400
Oakland, CA 94612

Dr. Charlie Huang (chuang@ospr.dfg.ca.gov)
Department of Fish and Game
1700 K St., Suite 250
Sacramento, CA 95814

Ms. Elizabeth Johnson (ejohnson@ci.alameda.ca.us)
950 W. Mall Square, Bldg 1
Alameda Point
Alameda, CA 94501

Cc (via email):

Claudia Richardson, Navy, Claudia.Richardson@navy.mil
Greg Lorton, Navy, Gregory.Lorton@navy.mil
Peter Russell, Russell Resources, peter@russellresources.com
Michelle Dalrymple, DTSC, mdalrymp@dtsc.ca.gov
Dot Lofstrom, DTSC, dlofstro@dtsc.ca.gov
Jim Polisini, DTSC, jpolisin@dtsc.ca.gov
Richard Perry, DTSC, rperry@dtsc.ca.gov