



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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SFD 8-3

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ALAMEDA POINT
SSIC NO. 5090.3

December 12, 2005

Mr. Thomas Macchiarella, Code 06CA.TM
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

RE: Draft Proposed Plan Former NAS Alameda Operable Unit 1 IR Sites 6, 7, 8 and 16

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document which we received on October 28, 2005. This Proposed Plan needs substantial revision. EPA requests that the Response to Comments (RTCs) be submitted 30 days after receipt of this letter and enclosed comments, and the draft final Proposed Plan be submitted 30 days after the submittal of the RTCs. The current PP is too lengthy, discusses an unnecessary amount of background information while missing some relevant explanations and contains substantial errors. Additionally, EPA disagrees with some significant aspects of this PP (e.g., Site 6 RAOs, Site 6 preferred remedy, Site 16 RAOs). Please find attached our comments and requests for revisions. If you have any questions, feel free to call me at (415) 972-3029.

Sincerely,

A handwritten signature in cursive script that reads "Anna-Marie Cook".

Anna-Marie Cook
Remedial Project Manager

enclosure

cc: Marcia Liao, DTSC
Judy Huang, RWQCB
Suzette Leith, EPA
John Chesnutt, EPA

**EPA Comments on the Draft Proposed Plan for Operable Unit 1,
IR Sites 6, 7, 8 and 16, Alameda Point**

General Comments:

1. This Proposed Plan needs substantial revision. EPA requests that the Response to Comments be submitted 30 days after receipt of these comments and the draft final Proposed Plan be submitted 30 days after the submittal of the RTCs. The current PP is too lengthy, discusses an unnecessary amount of background information while missing some relevant explanations and contains substantial errors. Additionally, EPA disagrees with some significant aspects of this PP (e.g., Site 6 RAOs, Site 6 preferred remedy, Site 16 RAOs).
2. The case for PAHs not being COCs is incorrectly made throughout this PP. The apparent reason for not taking action to clean up PAHs is that they are not site related and their presence can be attributed to dredged material used as fill. However, on other portions of the base, PAHs present in fill from dredged materials are being cleaned up, so that line of reasoning is not solid. Rather, the PP should state, in a fashion similar to that presented in the Site 15 PP, that PAHs are present in the soil at levels below the threshold action level of 1.0 ppm and below the site average action level of 0.62 ppm. These low concentration levels provide a sound reason for taking no action. Please apply this line of reasoning and explanation throughout the document.
3. Please note that the FS stated that groundwater samples would be taken beneath all OWS per EPA's request. This piece of information needs to be included for all sites in this PP. EPA would not object to the Navy performing this sampling at the RD stage so long as a reopener provision is included in the ROD.
4. The RI and FS overviews should be shortened and combined. The PP is extremely cumbersome to read in its current format.
5. The comparison of alternatives should be done in tabular format similar to that of Site 28 PP. The preferred alternative can be described in greater detail in text, perhaps in a boxed format to emphasize it.
6. **Site 6:**
As EPA stated in our letter of July 18, 2005, we do not agree with the clean up goals stated for Site 6. The stated RAOs appear too high to be protective of even the industrial receptor. In the worst case scenario, there may be a 1:1 degradation of PCE, TCE and DCE to vinyl chloride which would result in significantly higher risk levels from inhalation to not only residential but industrial receptors. Since the groundwater at Site 6 is Class II (although unlikely to be used as drinking water) and the area is within the zone

designated for protection by the RWQCBs Basin Plan, EPA reiterates that MCLs, or the equivalent, should be used as RAOs. The level for vinyl chloride should be set similar to that used for Site 26, and PCE, TCE and DCE should be substantially lowered to account for potential degradation to vinyl chloride.

In addition, EPA does not agree with the proposed remedy for Site 6. Thirty years is a long time for a remedial action when there are two reasonable alternatives that only take 3 to 4.5 years. In addition, the stated proposed remedy uses MNA as a component of the remedy. The lines of evidence to support MNA have not been established for Site 6 or any other site at Alameda Point, and in fact every indication to date has been that the degradation process stalls at the vinyl chloride stage. If the Navy wants to pursue an MNA remedy it will be necessary to make the remedy an interim remedy. EPA requests that the proposed remedy for Site 6 be changed to Alternative 4A or 4B.

7. Site 7:

The explanation for taking no action for groundwater at Site 7 needs to be expanded and clarified. First, as EPA has stated in comments on the RI and the FS, arsenic is not at background levels. The risk is at 2×10^{-3} , which is ten times higher than the background level. The Navy has recently stated that the high levels of arsenic and PAHs are secondary effects due to the presence of the TPH plume that is undergoing treatment at the site. EPA's position is that if the arsenic is being mobilized due to a release of TPH, it is not naturally occurring and is therefore a release itself. Since we consider the water beneath Site 7 to be Class III and there does not appear to be an unacceptable risk, we do not require remediation for arsenic or the PAHs. However, we want the explanation for the presence of the contaminants to be revised to explain that they are not background and the Navy to acknowledge that the RWQCB does protect this portion of the groundwater under its Basin Plan. The Board has stated to EPA that they believe that the TPH clean up program will take care of the PAH problem and may eventually take care of the arsenic. The Board has stated that they expect the Navy to have achieved background levels for arsenic within 10 years and will consider taking additional action if this is not the case. EPA recommends that the PP better explain the ongoing TPH cleanup so that the public has a clearer picture of the action being taken at this site.

Why is the risk presented in Table 2 for soil in the "non-debris" area higher than the risk in the "debris" area? Action is being taken to mitigate the risk in the debris area and it seems only appropriate that action be taken in the seemingly more contaminated "non-debris" area too. Risk due to background arsenic should contribute approximately 2×10^{-5} , and risk from PAHs at the screening level will give an additional 1×10^{-5} , for a total of 3×10^{-5} , which is what we typically see as a background soil risk at other sites at Alameda Point. The risk presented in Table 2 of 2×10^{-4} therefore appears site related and as such warrants a soil remedy, especially in light of the fact that the area is designated for residential use.

8. **Site 8:**
Site 8 also needs additional and current information and explanation to be included in the PP. The PP should state that soil and groundwater samples will be taken at the RD/RA stage when removing the OWS. Recent sampling from the groundwater monitoring program has shown detections of benzene and heptachlor in excess of MCLs. The IR 35 sampling program is going to take additional samples for PCBs and pesticides in soil and groundwater in the northern portion of the site and the results of these samples will need to be taken into account when drafting the Record of Decision. If significant concentrations of contaminants are discovered during the IR 35 pre-ROD sampling we will determine whether it was necessary to pull this site from the ROD and do an FS to evaluate GW remedies.
9. **Site 16:**
The RAOs stated in the table for Site 16 are incorrect and need to be replaced with MCLs.
10. **ARARs:**
Please refer to the attached memo for an explanation of when and which ARARs are appropriate to include in the Proposed Plan. Description of ARARs beyond that outlined in the memo should be deleted from this and all future PPs.

In each table comparing soil alternatives in the PP, the excavation alternative is rated “high” for reduction of toxicity, etc through treatment. This is not appropriate since there is no treatment.

Specific Comments:

1. **Page 3, first paragraph:** State that the removal action at Site 16 was for PCBs and lead in soil.
2. **Page 4, second paragraph:** Please delete the first sentence from this paragraph and all remaining sites. It serves no purpose.
3. **Page 9, first bullet in boxed text:** EPA requires a prohibition on residential use of the property until the equivalent of MCL levels are achieved in groundwater.
4. **Page 12-13:** The first paragraph under “Site 6 Feasibility Study Summary for Groundwater” is not internally consistent, and is confusing. If the RAO is to protect residents, why are the numbers stated as being calculated for commercial/industrial use?
5. **Page 12-13:** The RAOs are extremely high and no explanation is given of how they were calculated. Are they protective for inhalation? These numbers are much higher than

those used for Site 14 and 26 and EPA would require ICs prohibiting residential use of the property until levels of contaminants equivalent to MCLs are reached in the groundwater.

6. **Page 12-13:** The ICs mentioned for Alternative 3 would prohibit domestic use of groundwater, but not residential use of the property. EPA would require prohibition of residential use of the property unless the RAOs were set equivalent to the MCL.
7. **Page 12-13:** The proposed alternative cannot be considered an active remedy, which is EPA's preference for this site, with 30 years of MNA. In addition, MNA is an unproven technology for Alameda Point. Given the long timeframe, the questionable success of MNA and the high levels of the proposed RAOs, EPA does not agree with the proposed alternative for Site 6.
8. **Page 13** indicated that Alternative 3B is preferred partly because Alternative 2 will take much longer (second bullet). However, the writeups on page 12 have 30 years of MNA for both Alternative 2 and 3.
9. **Page 16:** The text in the first paragraph says that the RGs are based on the MCLs. But the numbers in Table 14 are not the MCLs.
10. **Page 16:** It is not clear what the difference is between Alternatives 3 and 4.
11. **Page 16:** MCLs are ARARs for Site 16 and therefore need to be used as the RAOs.

EPA's Comments on ARARs in Proposed Plans for Alameda Point, and Comments on ARARs in OU 1 PP

It is not necessary, and can be distracting, to include in a proposed plan an extensive discussion of ARARs. EPA recommends that ARARs discussions in a proposed plan be limited to the following:

1. EPA's ROD guidance indicates that the proposed plan should include the preliminary remediation goals and their basis, if appropriate (OSWER 9200.1-23P, p. 3-4 and 3-5). Therefore, if the remedial goal is based on an ARAR (e.g. an MCL), that should be stated in the proposed plan.
2. The ROD guidance also indicates that a key component of the proposed plan is an explanation of the differences between the proposed alternative and the other alternatives, and specifically states that the proposed plan may include key ARARs that must be attained by the preferred alternative but not other alternatives (p. 3-6).
3. The NCP indicates that the proposed plan should discuss any proposed ARAR waivers. Note that this does not require discussion of any regulations the Navy has decided are not ARARs, but only of regulations that are ARARs, but for which the Navy is proposing a waiver. (40 CFR 300.430(f)(2)(iv) and ROD guidance p. 3-6).

Neither the ROD guidance nor the NCP even suggests that all ARARs should be included in the proposed plan, nor that the proposed plan needs to include a discussion of regulations that are not considered to be ARARs. Rather, the key is informing the public. As stated in the NCP, the proposed plan "briefly describes the remedial alternatives analyzed by the lead agency, proposes a preferred remedial action alternative, and summarizes the information relied upon to select the preferred alternative." To the extent that an ARAR is significant to the remedy selection process – e.g., if it is used to set cleanup levels or distinguish the preferred alternative from other alternatives – it should be included. A listing of numerous ARARs, on the other hand, does little to inform the public as to how the preferred alternative will work and why it was selected, and, frankly, could very well be more confusing than helpful.

The ARARs discussion in the OU 1 proposed plan is not only unnecessary, but it also has numerous problems. In general, it is nothing more than a laundry list, with no explanation of what any specific requirement is, why it is an ARAR, or how it would be used in the remediation. More specific concerns include: Why include 42 USC 121 regarding alternative concentration limits? How were the RCRA groundwater protection standards used in developing remedial goals? What specific portions of the Basin Plan are ARARs? Why are the sections from Porter-Cologne ARARs? Why is the Inland Surface Waters Plan included, when it is not in effect? (Does the Navy mean the SIP, and if so, why is the SIP an ARAR?) Why is 88-63 is an ARAR? How is the public informed by a discussion of the historical disagreement over whether 68-16 should be an ARAR? (If the concern is to give the State the opportunity to comment on whether requirements such as 68-16 should be ARARs, they have the opportunity to raise such issues, and

bring disputes, at either the FS or ROD stage.) Please note that EPA is pointing out these specific concerns to illustrate why the lengthy ARARs portion of this PP is confusing and does not inform the public. We are not suggesting that the ARARs discussion be lengthened to respond to these comments. Rather, as discussed above, our preference is for the ARARs discussion to be shortened.

Comments from David Cooper, EPA's Community Involvement Specialist

1. The Navy did a good job of getting the critical information on the front page in a readable way.
2. At 22 pages (counting the comment form), the plan is long. It's obvious that someone worked hard to compress a lot of information on 4 separate sites (with a number of buildings), but additional efforts should be made to drop the page count under 20 pages. A number of my comments are examples of where there are redundancies or extraneous information that could be eliminated to reduce page count, while not impacting the reader's ability to understand and comment. While it's a small thing, an example of true, but unimportant, information is the reference that Building 391 is 2,000 square feet; another is the 1,840 foot distance of Site 7 to Seaplane Lagoon; a third is providing the date when the buildings were constructed.
3. It appears that the Alternatives sections were written to be nearly free-standing, thus there are a number of cases where the same language appears in all of them, such as "A more detailed discussion ... can be found in the FS." This could be written one time in an earlier section. The parenthetic on the tables could be shortened to "(see Table 11)". Little deletions or removal of repetitions sometimes help readability.
4. I also want to note that the Navy did a good job with many of the tables and maps (good size and placement). The text is not in columns, which makes it somewhat more difficult to read. A layout professional might have been able to improve the general look and feel of the document. The paragraphs are often large, which impacts readability. There is a recurring grammar problem with the use of "and" where there are two items grouped then a third item that is separate. I believe that the proper rule is to place a comma between the related couple and the unrelated couple. For example: "we need to review and comment, and send the document on its way."
5. As with other plans, the Navy continues to do a comparative analysis of the No Action Alternative. My understanding is that when the No Action Alternative is Not Protective (and sometimes the facilities argue that it is protective), then it can't be selected and should not be further analyzed in the balancing criteria.
6. For the RAO tables, it would be helpful to know what the current concentrations are. For example, if the concentrations were on an order or two of magnitude above the goal, an MNA option might be more attractive than if concentrations were two to four times the goal, in which case more active treatment would seem advisable.
7. A word about the comparison tables. The use of circles and half-circles can mask important comparison information. Usually, this is not true when there is only 2 or 3

options. But when there are five and two sets are variations on a theme, the simple bullets items in the justification are inadequate to explain how the Navy came up with the ratings. In a proposed plan, tables usually work much better when there is more information, not symbols (in an FS, there is infinite space to explain what each table symbol means, and qualify/quantify the differences).

8. It is not necessary to have a list of ARARs, only to identify ARAR issues (i.e., where the regulators and Navy disagree on a particular ARAR *and* that difference changes the viability of the Alternatives under consideration). This is a terrible waste of space and reading time, and makes the document a nearly two pages longer than necessary. Since it is absolutely necessary that all viable cleanup options meet the ARAR threshold, reading them does not help the potential commenter differentiate between options or identify a preferred alternative -- each options's ARARs apply, except the No Action Alternative.
9. **First Page.** There are a lot of formatting errors on this page, large gaps in the text. One way that might address this is to put the Comment Period and Public Meeting block at the bottom, which would allow the columns to be wider, which might make for fewer voids - - this is not a request, just a thought. I definitely like that this critical information is prominently displayed.
10. **First Page.** I blew by the asterisk. Maybe you could bold it and/or make it bigger to make sure that readers catch it.
11. **First Page.** The last paragraph repeats information from the first regular-text paragraph. It could be shortened by deleting "...the preferred alternatives for 6, 7, 8 and 16.."
12. **Second Page.** I always tell bases that the jargon section on authorities (CERCLA and NCP) is in impediment to readability and provides no useful information about the remedies. Have you ever considered squeezing it into a small footnote or shoving it in the back of the fact sheet? To my knowledge, there is not requirement for where such information must be placed.
13. **Second Page.** The second paragraph contains information from the last paragraph of the first page.
14. **Third Page.** The last sentence of the first paragraph says some of the same information as the last paragraph on the previous page.
15. **Third Page.** There are a number of sentence in the site-specific pages about numerous investigations having been performed. It could save space to simple put that comment on this page and delete it from subsequent pages.

16. **Fourth Page.** The paragraphs could be shortened. The last sentence seems like it belongs somewhere in the second paragraph. The COCs are the point of departure for the risk numbers.
17. **Fifth Page.** The last sentence of the first paragraph seems to be missing one or more articles.
18. **Sixth Page.** I didn't understand the reference to "GAP 3."
19. **Seventh Page.** The last paragraph is a good example of too much information. The paragraph describes early sampling that lead to later sampling that lead to conclusions. It's enough to say something like: "this is what we found when we sampled."
20. **Eighth Page.** The second paragraph could be reduced to about one sentence. Some of the information is not necessary.
21. **Eighth Page.** I think you need a comma in the middle of the third paragraph after "... recreational scenarios..." An editor should check for other instances of multiple uses of the word "and" in a sentence where it might be useful to have commas to make it read more easily.
22. **Ninth Page. Institutional Controls box.** I was confused by the third bullet which references groundwater but is talking about indoor air. Also, the phrase ICs "will be incorporated" sounds pre-decisional.
23. **Tenth Page.** You used the word you're defining in the definition for #4.
24. **Eleventh Page.** There is redundancy in the chemical list between paragraphs one and two.
25. **Twelfth Page.** I was confused by the text. I think I understand that Options 3a and 3b are cleaning to industrial standards and 4a and 4b are to residential standards. If that is so, I'd put it in the titles, e.g., "Treatment to Industrial/Commercial Standards using in-Situ..." and "Treatment to Residential Standards using ISCO..."
26. **Twelfth Page.** I was confused by the same 30 years of MNA for Options 2, 3 and 4. It seems like Option 2 gets you to the same spot, even if the others get you there much faster. This is the first time I've seen someone use MNA for an active remedy. I thought that the whole purpose of MNA was to avoid active treatment, which is an aspect of Options 3 and 4.

27. **Page 17.** The second bullet is wrong. The preferred alternative costs 4 times more than Alternative 2. There is insufficient information to understand why Options 4A, 3B, and 3A were not chosen.
28. **Page 17.** Delete the ARARs section. See my comment above.
29. **Page 19.** The Administrative Record should be available to the community of Alameda, not the community of San Diego.
30. **Page 20.** Since the whole purpose of this proposed plan is to solicit public comments on the alternatives, I would have put the first half of this page at the top of the previous page, with a title like: "Public Comment Process for this Proposed Plan." Based on the process as it's written, I am concerned about the public meeting. The text talks about displays and information, but doesn't say that the Navy will make a presentation explaining all the alternatives. It is important that the public as a whole hear the Navy's entire plan and that they have a venue where they can hear each other's issues and concerns.
31. **Page 21.** I did not review the glossary. Historically, facilities have had mistakes in their glossaries, not the least of which is defining the item by using the item in the defining sentence.
32. **Comment Form.** Can they be submitted via FAX?