



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



Department of Toxic Substances Control

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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 17, SEAPLANE LAGOON, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) reviewed the draft Proposed Plan (PP) for IR Site 17 dated October 2005 and has the following comments:

- 1. Remediation Goals for PCBs:** DTSC concurs with the California Regional Water Quality Control Board (RWQCB) that the sediment Ecological Preliminary Remediation Goal (EPRG) for PCBs of 1.13 mg/kg should be implemented as a not-to-exceed concentration in concert with the Total Maximum Daily Load (TMDL) of 200 ug/kg as an area-wide average (averaged over the dredged areas). We further concur with the RWQCB that a technical meeting should be held prior to finalizing the Record of Decision (ROD) to discuss the methods for calculating the 200 ug/kg concentration limit and compliance determination through fish tissue monitoring.
- 2. Remediation Areas:** The proposed remediation areas included as Figure 5 in the PP do not appear to encompass all the areas showing PCBs exceeding 1.13 mg/kg (see Appendix D of the FS report dated July 2005). Please clarify.
- 3. Human Health and Ecological Risk Assessment:** Please refer to the attached memorandum prepared by DTSC Human Health and Ecological Risk Division (HERD) for detailed comments.
- 4. Storm Sewer:** The description of the storm sewer as a potential residual source of contamination is too simplistic (page 2 of 17). Please provide a fuller explanation on this subject, including a description of what remains to be done for the network of sewers and the anticipated timeframe for execution.

Mr. Thomas L. Macchiarella
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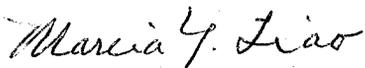
5. **Potential Residual Sources of Contamination:** In addition to the network of sewers, potential residual sources of contamination at the Seaplane Lagoon (SPL) may include the following:
- Groundwater discharges from OU-2B and, possibly, IR Site 27
 - Sediment at the north side of Pier 1
 - Construction debris pile

Please explain how and when the Navy plans to address these issues (see DTSC letter dated July 1, 2005 for related comments).

6. **Use of "PRG":** The term "PRG" or Preliminary Remediation Goal is a term most people would associate with the preliminary cleanup level US EPA has published. Please select an alternate term to avoid confusion (page 6 of 17).

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

Sincerely,



Marcia Liao
Remedial Project Manager
Office of Military Facilities

Attachment

Mr. Thomas L. Macchiarella
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Cc (via US Mail and email):

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Ms. Judy Huang (jchuang@waterboards.ca.gov)
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Alan C. Lloyd, Ph.D.
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Department of Toxic Substances Control

1011 North Grandview Avenue
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Arnold Schwarzenegger
Governor

MEMORANDUM

TO: Marcia Liao, DTSC Project Manager
OMF Berkeley Office
700 Heinz Street, Second Floor
Berkeley, CA 94704

FROM: James M. Polisini, Ph.D.
Staff Toxicologist, HERD
1011 North Grandview Avenue
Glendale, CA 91201

DATE: November 18, 2005

SUBJECT: DRAFT PROPOSED PLAN FOR SEAPLANE LAGOON (IR SITE
17) NAVAL AIR STATION ALAMEDA (NASA)
[SITE 201209-18 PCA 18040 H:12]

BACKGROUND

HERD reviewed the document titled *Draft Proposed Plan for Seaplane Lagoon (IR Site 17)*, dated October 2005. This document was prepared for Alameda Point, California. Alameda Point is the name currently applied to the former Naval Air Station Alameda (NASA). This review is in response to your written work request for HERD review during the month of November, 2005 and an electronic mail message requesting a rapid review.

The purpose of this Draft Proposed Plan is to provide public notice and the opportunity to comment on the Preferred Alternative for Seaplane Lagoon (SPL) also known as Installation Restoration (IR) Site 17. The Preferred Alternative is to dredge sediments from the northeast and northwest corners of the SPL, dispose of the dewatered sediments at a permitted off-site facility, and monitor the effectiveness of the remedy through a detailed sampling plan. Sediment Remedial Goals are outlined for the Preferred Remedial Alternative. Based on the current reuse plans, developed by the Alameda Reuse and Redevelopment Authority (ARRA), SPL is expected to be developed as a commercial marina surrounded by a mixed-use marina-related district comprised of housing and industrial, commercial, recreational and open waterfront space.

In 1930, the U.S. Army acquired the original base property from the City of Alameda and began construction activities in 1930. In 1936, the Navy acquired title to the land from the Army and began building an air station. Construction of the Base included filling tidelands, marshlands, and sloughs with dredge materials from the San Francisco Bay. Naval Air Station Alameda (NASA) was an active naval facility from 1940 to 1997. Base operations included aircraft, engine, gun and avionics maintenance; engine overhaul and repair; fueling activities; and metal plating, stripping and painting activities.

GENERAL COMMENTS

The sediment Total Maximum Daily Load (TMDL) for Polychlorinated Biphenyls (PCBs) and the Ecological Preliminary Remediation Goal (EPRG) should both be incorporated into the sediment Remedial Action Objective (RAO).

SPECIFIC COMMENTS

1. The initial description of the final destination of the dewatered sediments is 'at a permitted off-site waste disposal facility' (page 1 of 17). The figure presenting the IR Program Process (Figure 1, page 2 of 17) only specifies 'upland disposal'. The figure description should be amended to state 'upland disposal in a permitted facility', as upland uses rather than disposal of the IR Site 17 sediments, such as levee creation, have been discussed in the past. In fact, 'upland disposal' and 'upland confinement' are specified, respectively, (Table 2, page 9 of 17) in Remedial Alternative 5 and Remedial Alternative 6.
2. There appear to be some errors in the presentation of sediment sampling locations in IR Site 17 (Figure 3, page 4 of 17):
 - a. Two distinct Berkeley Environmental Restoration Center (BERC) 18 sample locations are indicated on the eastern boundary of the rectangle of BERC sample locations nearest the northeast corner of IR Site 17;
 - b. Two BERC 8 locations are indicated in the northwest corner of the rectangle of BERC sample locations nearest the IR Site 17 breakwater.Please correct these apparent labeling errors.
3. The two figures presenting IR Site 17 sampling locations (Figure 3, page 4 of 17) and Proposed Remediation Areas (Figure 5, page 8 of 17) present differing labeled sample locations without explanation in the text. The S01 – S07 1993 Sampling locations and the SP01 – SP10 1998 sample locations do not appear in the second figure. Please provide a supportable rationale for deleting these two series of IR Site 17 samples from the second figure presenting the areas proposed for remediation.

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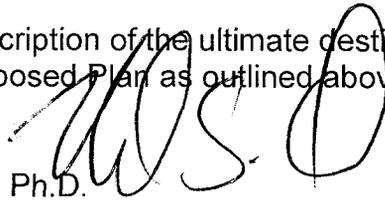
4. A portion of the summary of the ERA conclusions should be amended (Page 6 of 17, second bulleted item in upper listing). The conclusion on benthic toxicity should be amended to indicate 'there is a low potential for acute hazard or risk to the benthic community'. Percent survival, and reburial in some amphipod tests, were the only adverse effect observations made after short-term (i.e., acute) exposure. No chronic exposure testing was performed.
5. The sediment EPRGs (Table 1, page 7 of 17) accurately reflect the quantitative results of the sediment ERA for IR Site 17. However, the quantitative results of the ERA, which resulted in a sediment EPRG of 1.13 mg/kg PCBs, must be incorporated into the San Francisco Regional Water Quality Control Board (SFRWQCB) TMDL of approximately 200 µg/kg to 240 µg/kg PCB, depending on the specific PCB congeners analyzed. The sediment PCB RAO should be stated as sediment PCB concentration not to exceed 1.13 mg/kg in any single sediment confirmation sample with the area-wide average not to exceed 200 µg/kg.

CONCLUSIONS

The Proposed Plan should state that the sediment Ecological Preliminary Remediation Goal for polychlorinated biphenyls of 1.13 mg/kg should be implemented as a not-to-exceed concentration in concert with the Total Maximum Daily Load of approximately 200 µg/kg as an area-wide average.

Minor editorial changes in the figures and description of the ultimate destination of the dredged sediment should be made in the Proposed Plan as outlined above.

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



cc: Sophia Serda, Ph.D.
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