



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105  
SFD 8-3

December 14, 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 5 and Annex IR 02  
Groundwater**

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document which we received on October 31, 2005. Overall the Proposed Plan addressed the comments and concerns EPA had with the earlier draft, and we greatly appreciate the Navy's decision to separate this Proposed Plan and its groundwater issues from the one dealing with the Site 25 soil. 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: Mary Parker, BRAC PMO West  
Marcia Liao, DTSC  
Judy Huang, RWQCB  
Suzette Leith, EPA  
John Chesnutt, EPA

## **EPA Comments on Draft Proposed Plan for Former NAS Alameda Operable Unit 5 and Annex IR02 Groundwater**

### **General Comments:**

1. The two column layout makes for much easier reading and tidier appearance than the format used for Sites 14 and OU 1. Great work!
2. Overall, the readability of this Proposed Plan is a huge improvement on the previous draft which combined the OU 5 groundwater with the Site 25 soil. EPA appreciates the responsiveness to our comments on that first version and finds that most of the recommended changes have been incorporated into this new version.
3. The risk assessment description is somewhat confusing. It is not clear what the cancer versus non-cancer risks are and what COCs are contributing to each. It is also unclear what exposure pathways were evaluated and what the resulting risks were from the exposure pathways.
4. The Institutional Controls description does not state whether they are a prohibition against wells or a prohibition against residential use. The PP also does not state when the ICs will end.

### **Specific Comments:**

1. **Page 1, first column, first sentence:** Please mention that both benzene and naphthalene are the primary contaminants.
2. **Page 1, first column, third sentence:** Revise sentence to state “Evaluations of groundwater contamination show that there is no immediate risk to children, residents or others in these areas.”
3. **Page 1, first column, fourth sentence:** Replace the word “impacted” with “contaminated”. Using the word impacted makes it appear as if the Navy is trying to underplay a problem by using a term not usually applied to groundwater contamination.
4. **Page 1, first column, second bullet:** Again, I recommend not using the word “impact”, since this is not a common use of the term. Use a word like “effects”.
5. **Page 2, second column, bulleted item:** Add the phrase “effective and” after the word “remedy”.

6. **Page 2, second column, first sentence:** Replace the word “between” with “ranges from”
7. **Page 2, second column, second and third full sentences:** This description is confusing because the second sentence is referring to vertical migration of contaminants and the third sentence mentions lateral flow directions. The sentences do not follow and need clarification.
8. **Page 3:** Missing from the history of the Sites is the fact that Site 31 and parts of IR 02 were used as the former Alameda Airdrome with associated airplane maintenance and fuel spills.
9. **Page 4, second column, last sentence:** Please clarify through which exposure pathway benzene contributed the 95% cancer risk.
10. **Page 5, bottom of first column:** The sentence “In this case, for every 10,000 people, one additional cancer case may occur as a result of exposure.” It appears as if the cancer risk for OU 5 is  $10^{-4}$ . However, perhaps the sentence is meant to clarify the previous sentence? Please revise the wording to make it clear why this example is given.
11. **Page 5, second column, first sentence:** EPA’s unrestricted use for most sites is  $10^{-6}$  and we find it misleading to present the risk management range as being equivalent to unrestricted use.
12. **Page 5, second column, second full paragraph, first sentence:** It is not productive to have this sentence in the PP where the decision is to take action. We recommend it be deleted.
13. **Page 5, second column, second full paragraph, second sentence:** This sentence is an overstatement and does not necessarily follow from the first sentence. EPA requests that the sentence be deleted and that the risk management description from the fourth paragraph on page 3 of the OU 1 PP replace this paragraph in OU 5 PP.
14. **Page 8:** Very nice schematic of the biosparge system. It really breaks up the monotony of the text to have a graphic like this. Please contour the western portion of the plume in Figure 4 with a broken/dashed line. At this time there is every indication of a fourth hot spot to the west of the Zone 3 plume center. (See EPA comments on the RI/FS).
15. **Page 9:** As EPA has stated on previous PPs, we do not believe that it is appropriate to include ARARs in a PP geared for public readability, except in certain special circumstances. We are attaching a memo that ORC has drafted to more clearly explain when and what to include in ARARs descriptions.

16. **Page 12:** I would recommend either deleting this table or condensing it to fit at the bottom of Page 11. Spacing on the two pages currently is underutilized and looks uninteresting.

## EPA's Comments on ARARs in Proposed Plans for Alameda Point

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.