



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



Department of Toxic Substances Control

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

N00236.002206
ALAMEDA POINT
SSIC NO. 5090.3



Arnold Schwarzenegger
Governor

December 16, 2005

Mr. Thomas Macchiarella
BRAC Environmental Coordinator
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310

PROPOSED PLAN, FORMER NAS ALAMEDA AND ANNEX OPERABLE UNIT 5/ANNEX IR-02 GROUNDWATER, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has received the draft *Former NAS Alameda and Annex Operable Unit 5/Annex IR-02 Groundwater* dated October 31, 2005 for the benzene and naphthalene plume straddling the Alameda Point and former Fleet and Industrial Supply Center Oakland, Alameda Facility/Alameda Annex (FISCA). DTSC provided comments on previous draft Proposed Plan on July 16, 2005 which covered the soil remedy at the Alameda Point, Installation Restoration Site 25. The current draft does not include such soil remedy. DTSC has reviewed the Proposed Plan and determines the plan unacceptable. The following comments describe the deficiencies:

1. Document Title and Site Name: The apparent title of the Proposed Plan is *Former NAS Alameda and Annex Operable Unit 5/Annex IR-02 Groundwater*. DTSC requests the words "Proposed Plan" be prominently identified as the title of the subject document. DTSC requests the Navy refrain from using "Annex," "FISC," "Alameda Annex," and other casual permutations in formal documents to name the former Fleet and Industrial Supply Center Oakland, Alameda

Facility/Alameda Annex site. The correct abbreviation in formal documents for this lengthy site name is "FISCA."

2. Institutional Controls: DTSC remains concerned about the potential of benzene and naphthalene vapor intruding into building interiors between start of active remedy and completion of the natural attenuation phase to performance standards (see Comment #3 below). In DTSC letters to the Navy dated February 9, 2005 and July 15, 2005, DTSC concluded that the indoor air risk calculation was not acceptable because incorrect source term was used, and indoor air risk for naphthalene as a carcinogen was not evaluated. The Navy's responses to comments failed to address these issues to DTSC's satisfaction. Therefore, DTSC must require institutional controls for all structures within the foot print of the benzene/naphthalene plume as delineated by the 1 µg/L benzene isoconcentration line. Such institutional controls will include (a) annual indoor air and/or subslab or crawl space air monitoring for a selected group of existing homes and buildings as proposed during the remedial design, and (b) a sub-slab depressurization system for each new home and commercial/industrial building should the monitoring of existing homes suggest vapor intrusion. DTSC requires both the Proposed Plan and the Record of Decision to include these institutional controls as parts of the remedy for the benzene and naphthalene plume.
3. Biosparging Performance Standard: DTSC continues to require the Navy to specify benzene and naphthalene target concentrations for groundwater and saturated soil on which biosparging could be stopped and monitored natural attenuation could be commenced. DTSC will also require the Record of Decision to include provisions for restarting the biosparging system after three to five years of unsuccessful attenuation of contaminant concentrations. In the Response to Comment on the Proposed Plan, DTSC needs the Navy to indicate that such numerical target concentration would be specified in the Record of Decision, and that biosparging would be restarted when monitored natural attenuation fails.
4. Remedial Action Objective for Naphthalene in Groundwater: From the response to DTSC comment on the previous draft Proposed Plan, the Navy has not acknowledged DTSC's criteria for terminating the groundwater use restriction in a land use covenant. The California Department of Health Services' Drinking Water Notification Level for naphthalene is 17 µg/L; however, this notification level (or other concentration) may become the California Maximum Contaminate Level by the time the Navy is contemplating the removal of the groundwater use restriction. DTSC reiterates that the applicable California drinking water standard at the time would be the remedial action objective for unrestricted groundwater use.

5. Maximum Contaminant Levels (MCL) as Applicable or Relevant and Appropriate Requirements (ARARs): The California Regional Water Quality Control Board believes the deep aquifer underlying the Alameda Point property east of Saratoga Street is a potential drinking water source. Therefore, both the shallow and deep aquifers must be protected for domestic uses. DTSC has determined that MCL is ARARs for such groundwater at the Alameda Point property. In addition, DTSC has communicated with the Navy repeatedly that the determination of groundwater beneficial use alone is not a remedy for contaminated groundwater. The groundwater beneficial use discussion in page 9 of the Proposed Plan is incomplete. The Proposed Plan must include MCL as ARARs for the subject plume at Alameda Point.
6. Page-Specific comments:
 - Page 1, second paragraph: Please specify that both benzene and naphthalene are the primary contaminants for the plume.
 - Page 2, fourth paragraph: Please include the following sentence as the concluding statement of the paragraph: "The Navy, EPA, and DTSC will approve and sign the Record of Decision documenting the final selection of the cleanup remedy."
 - Page 3: The description for the impacted groundwater is incomplete. Please revise the Proposed Plan to include (a) FISCA BRAC Parcels 22, 23, 27, 28, and 30 and (b) the College of Alameda as portions of areas impacted by the benzene and naphthalene plume.
 - Page 4, sixth paragraph, fifth sentence: Please replace the sentence with the following: "Benzene and naphthalene concentrations appear to increase with depth (greatest concentrations at 20 feet bgs)."
 - Page 5, sixth paragraph: For the record, DTSC disagrees with the Navy's risk evaluation for reasons already stated in all previous comment letters on the draft proposed plan and feasibility study report for the benzene and naphthalene plume.
 - Page 8, Figure 4: DTSC has requested the footprint of Biosparge Zone 2 be expanded to cover locations OU5-SG-20D and SG-T2-4'. These locations contain two maximum benzene soil gas detections among FISCA and the Alameda Point. The Biosparge Zone 2 coverage as depicted in Figure 4 of the

Mr. Thomas Macchiarella
December 16, 2005
Page 4

revised Proposed Plan is only slightly altered, but not enough to encompass OU5-SG-20D and SG-T2-4' locations. The eastern limit of Biosparge Zone 2 must be extended beyond the north-south margin aligning with the eastern edge of former Building 366.

- Page 9, last paragraph: Please define "HSC" before its use.
- Page 10, first paragraph: Please delete "BAAQMD" because this acronym is not used in succeeding text.
- Page 14: Please spell out "Dept."

Additional comments from DTSC Public Participation Unit will be forwarded under a separate cover. Please provide DTSC the Response to Comment and redlined Proposed Plan both in hard copies and Portable Document Format files saved in a compact disc. DTSC is committed to working with the Navy in comment resolution. If you have any question, please contact me at (510) 540-3772.

Sincerely,



Daniel E. Murphy, P.E.
Unit Chief
Office of Military Facilities

Mr. Thomas Macchiarella
December 16, 2005
Page 5

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

Ms. Debbie Potter
Base Reuse and Redevelopment Manager
City of Alameda
Development Services Department
Alameda Point Main Office
950 West Mall Square
Alameda, California 94501

Cc (via email):

Greg Lorton, Navy, Gregory.Lorton@navy.mil
Mary Parker, Navy, Mary.parker@navy.mil
Lou Ocampo, Navy, Lou.Ocampo@navy.mil
Peter Russell, Russell Resources, peter@russellresources.com
Richard Perry, DTSC, rperry@dtsc.ca.gov
Dot Lofstrom, DTSC, dlofstro@dtsc.ca.gov
Kamili Siglowide, DTSC, ksiglowi@dtsc.ca.gov
Henry Wong, DTSC, hwong@dtsc.ca.gov
Marcia Liao, DTSC, mliao@dtsc.ca.gov