

From: Richardson, Claudia CTR OASN (I&E) BRAC PMO West
Sent: Monday, March 20, 2006 11:37 AM
To: Silva, Diane C CIV NAVFAC SW
Cc: Nancy L. Bonnevie (E-mail) (E-mail); Melissa A Manley (E-mail)
Subject: FW: Seaplane Lagoon Proposed Plan

Hi Diane,

Here is Public Comment from Mr. Patrick Lynch for the Admin. Record for Seaplane Lagoon IR 17 Proposed Plan (Alameda Point, Alameda, Ca).

Thank you
Claudia Richardson
Alameda Remedial Project Manager

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-----Original Message-----

From: Macchiarella, Thomas L CIV OASN (I&E) BRAC PMO West
Sent: Monday, March 20, 2006 11:25
To: Richardson, Claudia CTR OASN (I&E) BRAC PMO West
Cc: Lorton, Gregory A CIV NAVFAC SW
Subject: FW: Seaplane Lagoon Proposed Plan

Claudia, FYA.

--TLM.

-----Original Message-----

From: Patrick Lynch [mailto:clearwater@toxicspot.com]
Sent: Friday, March 17, 2006 16:36
To: Macchiarella, Thomas L CIV OASN (I&E) BRAC PMO West
Subject: Seaplane Lagoon Proposed Plan

Thomas:

The following comments on the Seaplane Lagoon Proposed Plan.

COMMENT No. 1 - The information repository at the Alameda Public Library, which has been closed since March 3, was not available to enable me to review the key documents supporting the recommendations made in the proposed plan. The lack of public access to review and copy key documents during evening hours and weekends I find unacceptable. I feel that an additional 30-day comment period should be allowed after the library reopens on March 20, 2006.

COMMENT No. 2 - Again, simply providing the document index numbers and titles of key documents in the Proposed Plan would greatly enhance the ability of the public to access this information.

COMMENT No. 3 - What is preventing key documents supporting the proposed plan to be made available online.

COMMENT No. 4 - In March 1969 the Alameda Naval Air Station failed to comply with a Cease and Desist Order from the Regional Water Quality Control Board (RWQCB) to stop discharging industrial wastes and

untreated wastewater into the Seaplane Lagoon. As the proposed plan notes this illegal discharge continued until 1975. The 1983 Initial Assessment Study describes the Seaplane Lagoon during this period of illegal discharge was occurring. The IAS recalls instances where fish caught in the Seaplane Lagoon smelled of solvents and that boats anchored in the Seaplane Lagoon had their paint removed. The US Navy bears a greater responsibility for "ambient" pollution in San Francisco Bay than any other major discharger based on the US Navy's unique failure to comply with Cease and Desist Order's issued to all major industrial dischargers to the bay.

COMMENT No. 5 - The Proposed Plans estimated total volume of the industrial waste discharged to the Seaplane Lagoon of 300 million gallons is far below the discharge volume of 525,000 gallons per day listed in the Cease and Desist Order.

COMMENT No. 6 - The Proposed Plan's statement that a stormwater pollution prevention program has been in place at Alameda Naval Air Station since 1975 is absurd. Hazardous waste storage areas did not meet design requirements until 1993. Stormwater that accumulated in hazardous waste containment areas was often discharged onto landscaping at Site 3. In one instance the contaminated stormwater discharged to Site 3 resulted in the deaths of dozens of migratory ducks.

COMMENT No. 7 - The Marsh Crust Excavation Ordinance is not listed as an ARAR despite the fact that the ordinance is an applicable requirement. The Marsh Crust Record of Decision shows the Marsh Crust at a depth of 10 feet below ground surface in portions of the Seaplane Lagoon. While the Marsh Crust Excavation Ordinance excluded Site 25, 30, and 31 (a significant deficiency that should have been identified in the 5-Year Review), it includes the Seaplane Lagoon in its entirety. The City Engineer however has violated the Marsh Crust Ordinance by failing to adopt an excavation depth for the Seaplane Lagoon.

COMMENT No. 8 - What steps will be taken to eliminate odor problems from the handling of excavated sediments? Why haven't BAAQMD regulations for odors been identified as ARARs?

COMMENT No. 9 - How will residual contamination in sediments impact future redevelopment of the Seaplane Lagoon?

Sincerely,

Patrick G. Lynch, P.E.
Chemical/Civil Engineer