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ALAMEDA POINT
SSIC NO. 5090.3

From: Dot Lofstrom [DLofstro@dtsc.ca.gov]
Sent: Wednesday, May 24, 2006 1:52 PM
To: Ocampo, Luciano A CIV NAVFAC SW
Subject: Re: Requesting deferral and NFA on OWS 020 & WD 020

Lou,

I had to review Site 26 and be sure that I still think that the GAPS do not require further evaluation. That is still my viewpoint, and one that I have presented to my branch chief, so I do not foresee any problems with that statement. We are also in agreement that the soil does not require additional investigation in association with WD-20 and OWS-20.

I'm leaving the office at 2:00 and will be out tomorrow (Thursday) returning Friday if you need additional (or more formal) concurrence.

Dot

Dot Lofstrom, P.G.
Senior Engineering Geologist
Office of Military Facilities
Department of Toxic Substances Control
California Environmental Protection Agency
(916) 255-6449
cell: (916) 416-4309
fax: (916) 255-3734

>>> "Ocampo, Luciano A CIV NAVFAC SW" <luciano.ocampo@navy.mil>
5/16/2006 9:41:01 AM >>>
Hi Dot,

Forwarding you the attached figure showing the locations of SWMUs WD020 & OWS020 relative to the VOC plume at IR26, and the email from the contractor as shown below. The figure shows that the SWMUs are on the plume, which may support the assumption that they were the source. Under the ongoing IR 26 ROD, there will be a remedial action on groundwater due to the plume and there will be NFA on the soil.

Briefly, the proposed plan for IR26 stated that the RCRA evaluation process will be completed before the ROD is completed. After reviewing the documentation provided you on the SWMUs and the draft ROD, you concurred with the Navy determination on the SWMUs. The determination is NFA for all the SWMUs except further evaluation for WD 020 and OWS 020.

We are forward the Navy final evaluation and request that: a) NFA on soil and groundwater for these SWMUs, and b) deferral to IR26 remedial

action of any SWMU correction action requirements on the groundwater.

We

will include this evaluation in the draft final ROD IR 26 due for submittal by this month.

Please let me know if you need info. Thanks.

Lou Ocampo, PE

BRAC PMO/NAVFAC SW

Remedial Project Manager

tel. # (619) 532 -0969

fax # (619) 532-0995

<<figure-voc-plume&osw20-wd20-ir26.pdf>>

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Hi Lou,

I checked the SWMU report. I believe the text you were referring to is the following: from Table H3-1: "At one sampling location 192-003-006, TPH soil concentrations exceeded both residential and nonresidential PRCs, potentially indicating free product." This sample was taken from

a depth of 3 to 4 feet bgs (see Figure H3-2B), and the FWBZ is at a depth

of 2 to 6 feet bgs. Because this is in the saturated zone of soil, the data is supportive of the groundwater action and doesn't indicate a soil

source nor necessitate a soil action to close out RCRA. In addition, the

data for this sample are flagged as estimated and not matching a typical

fuel pattern or the calibration standard, which is indicative of a release from CERCLA activities rather than a TPH only release. The groundwater remedy also will reduce the concentrations of VOCs in this saturated zone of soil, and the following text from the ROD should sufficiently close out the RCRA SWMUs (OWS 020 and WD 020) identified

by the SWMU report for further action.