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ALAMEDA POINT
SSIC NO. 5090.3

DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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Ser BPMOW.mep/0588
5 Jul 2006

Ms. Anna-Marie Cook (3 copies)
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Ms. Dot Lofstrom (2 copies)
Department of Toxic Substances Control
8800 Cal Center Drive
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Ms. Judy Huang
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Ms. Cook, Ms. Lofstrom, and Ms. Huang:

I am pleased to submit to you the *Draft Final Proposed Plan for Installation Restoration Site 25 Soil, Former NAS Alameda, Alameda, California*, dated July 6, 2006. This Proposed Plan provides a summary of the Remedial Investigation and Feasibility Study reports, and presents the Navy's preferred remedial alternative. The Navy has incorporated your comments on the Draft and Working Draft Final Proposed Plans into this version in accordance with discussions on June 27, 2006. Agreement was reached on June 27, 2006 between the Navy and the agencies that additional discussions will be held regarding the level of detail to be placed in the record of decision (ROD) and post-ROD documents for institutional controls and their implementation. A response to informal agency comments submitted via e-mail on the Working Draft Final Proposed Plan is provided in a table that accompanies this Proposed Plan.

Please note that this Draft Final Proposed Plan is not suitable for public release. In accordance with Section 10 of the Federal Facility Agreement, this document is scheduled to become final on August 4, 2006. As planned, the Final Proposed Plan is scheduled to be issued to the public on August 21, 2006.

If you have any questions, please call Ms. Mary Parker, Remedial Project Manager, at 619-532-0945, or me at (619) 532-0907.

Sincerely,

THOMAS L. MACCHIARELLA
BRAC Environmental Coordinator
By direction of the Director

Enclosure: 1. Draft Final Proposed Plan for Installation Restoration Site 25 Soil, Former NAS Alameda, Alameda, California, July 6, 2006

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**Responses to Informal Agency Comments
on the Working Draft Final Proposed Plan
for IR Site 25 Soil
Provided via E-mail on 5 June 2006**

<i>Ms. Dot Lofstrom, DTSC Project Manager</i>			
#	Reference	Comments	Responses
Informal DTSC Comment			
1		<p>I think there should be additional information in Table 4. DTSC is going to need assurances regarding PAH concentrations in soil prior to development of this site.</p> <p>Examples of the type of assurances we will need include:</p> <ol style="list-style-type: none"> 1. Bringing in additional soil, which may be in conjunction with construction needs (i.e., surcharging), creating four feet of clean soil separation between residences and fill. 2. Collecting additional samples from each individual lot to ensure that an average concentration of 0.6 mg/kg benzo(a)pyrene equivalent exists across the lot (not just the entire site). 3. Additional excavation if a concentration of 0.6 mg/kg is not achieved for each lot. <p>Understand, these are requirements for the future developer, not the Navy. But it seems misleading if we don't mention it here in the proposed plan. DTSC will require vapor barriers beneath residences for any future development, since there is uncertainty regarding the validity of the soil gas data used for the J&E modeling effort because of the shallow depth to groundwater.</p>	<p>In accordance with principles for land use controls developed jointly by the U.S. EPA and Navy, the Proposed Plan and ROD generally describe the land use controls and specify the performance objectives, as described in the Site 25 Proposed Plan. Post-ROD documentation, including a Land Use Controls Remedial Design (Primary FFA deliverable), addresses implementation and enforcement of the land use controls. Please also note that the groundwater at Site 25 is part of the OU-5 plume and is being addressed separately.</p>

**Responses to Informal Agency Comments
on the Working Draft Final Proposed Plan
for IR Site 25 Soil
Provided via E-mail on 5 June 2006**

<i>Ms. Anna-Marie Cook, U.S. EPA Project Manager</i>			
Informal PA comments on Site 25 Working Draft Final PP			
U.S. EPA Comment			
#	Reference	Comments	Responses
General Comments			
1.	Page 1, first sentence	For clarity suggest stating "the second and final phase of the response action..."	Concur. Sentence 1 and column 1 sentence 1 of the Proposed Plan was revised as requested.
2.	Page 1, first column, first and second sentences, second par:	It is stated that there were two removal actions, but it appears that only one is discussed which leaves the reader wondering about the second removal action.	In sentence 2, "from the upper 2 feet" was deleted. Sentence 2 now refers to both removal actions.
3.	Page 2, first column third par:	As far as dates for the public meeting, has the Navy factored in the RAB's request for briefing on the PP prior to the public meeting dates?	Yes, the Navy plans to brief the RAB on September 7, 2006.
4.	Page 4, first column, third par:	For accuracy, the Navy may want to state that the soil in Clover Park was excavated to a depth of 4 feet rather than 2 feet.	Paragraph 3, sentence 1 was revised to delete "from surface to a depth of 2 feet." Sentence 2 was revised to add "to a depth of 4 feet below surface." Paragraph 4, Sentence 2 was revised to add "to a depth of 2 feet below surface."
5.	Page 4, Table 1:	Seems that the word "for" would read better than "and" in the title.	The text was revised as requested.

**Responses to Informal Agency Comments
on the Working Draft Final Proposed Plan
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#	Reference	Comments	Responses
Specific Comments			
6.	Page 6, last par:	There appears to be a conclusion that where numbers are in the risk range, that's reason enough to not do anything. There should be more analysis, although for the PP it is probably not necessary. For the ROD, a more detailed reasoning should be included.	Additional rationale shall be provided in the ROD.
7.	Page 7, first par:	Under Remedial Alternatives, it is mentioned that Alts. 4 and 5 were screened out because of very high costs. The FS states the costs were 18 and 31 million and if they were included in the PP, it would answer the question (that EPA's management kept raising) of how much it would cost to just dig it up. We recommend a short sentence stating the costs of all alternatives. Also, in that same paragraph, it says that under alts. 4 and 5, ICs are still needed, but it is not clear why.	In the first paragraph under "Remedial Alternatives," sentence 3 was revised to add "(\$18.8 million and \$31.4 million, respectively)" at the end of the text stating high costs. Because ICs are the same as for other alternatives, and address areas covered by buildings and hardscape and deeper depths, that text was not revised.
8.	Page 7	Discussion of overall protectiveness, says alt. 2 meets the criterion because things are fine in the first four feet. It should be added that the ICs will take care of soil deeper than four feet.	In accordance with this comment, the following sentence was added after sentence 3: "For soil deeper than 4 feet, ICs will be implemented to limit human contact to this soil."
9.	Page 8	Discussion of long-term effectiveness. If there is no need for remediation in the first four feet, then why does alt. 3 rate higher on this criterion than alt. 2? Same question for Table 7 on Page 10.	Although this was in the FS, the Navy agrees with your comment. Because ICs are a component of both alternatives, the rating for Alternative 3 was revised to "moderate" in the text discussion and on Table 7.

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ENCLOSURE 1

DRAFT FINAL PROPOSED PLAN FOR
INSTALLATION RESTORATION SITE 25 SOIL

DATED 06 JULY 2006

IS ENTERED IN THE DATABASE AND FILED AT
ADMINISTRATIVE RECORD NO. N00236.002362