



November 17, 2003

Mike McClelland
Environmental Coordinator
BRAC Operations
1230 Columbia Street, Suite 1100
San Diego, CA 92101

Dear Mr.  McClelland:

On behalf of the Alameda Reuse and Redevelopment Authority (ARRA), Peter Russell, Ph.D., P.E., of Northgate Environmental has briefly reviewed the Navy's August 15, 2003 *Draft Soil Feasibility Study, Operable Unit 5, Alameda Point, Alameda, California* ("Draft OU-5 FS"). The purpose of these comments is to clarify ARRA's position that it would be inappropriate to extrapolate any of the statements, alternatives, or conclusions contained in the *Draft OU-5 FS* to FSs for elsewhere at Alameda Point. The acceptability of not excavating or treating soil at depth could be very different in other situations at Alameda Point. Time critical removal actions that have been taken at OU-5 have removed soil to a depth of either 2 or 4 feet below ground surface ("bgs"). In ARRA's view, such actions should create no precedent that would be used in future Alameda Point decision-making. OU-5 contains dwellings occupied by Navy, Coast Guard, and Marine Corps personnel and their families on a short-term basis. Such residents may differ in important respects from future residents at other areas of Alameda Point for many reasons, including but not limited to:

- a) duration of residence in one dwelling;
- b) ownership of the property (owners might be more inclined to dig deeply for landscaping or other purposes);
- c) likelihood of complying with land use restrictions, such as a prohibition against vegetable gardening or digging that would result in exposure to soil below the 2-foot remediation depth; and
- d) sensitivity to future resale value.

The comments below, while not exhaustive, comprise Dr. Russell's brief review of the document:

Development Services Department

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1. Alternative 3 proposes to excavate soil shallower than 2 feet bgs in localized zones in Decision Areas (“DA”s) 2 and 6 where results of analysis of shallow soil samples are above the PAH target cleanup levels. Eighteen such localized zones are identified in DA 2 and 17 zones in DA 6. Nine hundred ninety bank cubic yards are proposed for excavation, which, for an excavation depth of 2 feet, represents an average footprint for each zone of 360 square feet (“sqft”). This implies that each soil sample is representative of soil conditions in the 360 sqft immediately surrounding it, otherwise a different size surrounding area would be excavated to address the health risk. The basis for identifying the localized zones is 53 samples collected from shallower than 2 feet bgs, thus the total sampling exercise impliedly represents soil conditions for about 19,000 sqft (360x53). However, this area is only about 6% of the total area of the two DAs, apparently leaving the remaining 94% of DAs 2 and 6 without having been represented by sample results. Thirty-seven (70%) of the 53 of these near-surface samples contained PAHs above the target cleanup level. This suggests that, unless there is some unstated reason for expecting the unsampled areas to be cleaner, 70% of the balance of DAs 2 and 6 would be similarly excavated, if only it had been sampled. This situation draws into question the *Draft OU-5 FS*'s evaluation of the following FS criteria for Alternative 3 as currently stated: Overall Protection of Human Health and the Environment, Compliance with ARARs, Long-Term Effectiveness And Permanence, Short-Term Effectiveness, and Cost.
2. The excavation provisions of Alternative 3 do not specify confirmation sampling to establish whether the lateral extent of each excavation is great enough to have fully remediated soil above the PAH target cleanup level in the vicinity of the zone.
3. Alternative 3 does not provide for shallow soil excavation to remove PAHs above the target cleanup level beneath dwellings and other structures, paved areas, trees, utilities and some other features. None of these features is permanent, and, in all likelihood, future replacements for them would not occur in footprints that precisely coincide with the current site layout. This future residential exposure should be considered in the health risk assessment. Because it is omitted, the current health risk assessment underestimates health risks to future residents. This aspect of Alternative 3 is not mentioned in the Executive Summary and is not clearly stated anywhere in the *Draft OU-5 FS*. Were this consideration to be included in the evaluation of FS criteria, the evaluations for Overall Protection of Human Health and the Environment, Long-Term Effectiveness and Permanence might be less favorable than is currently stated in the *Draft OU-5 FS*.
4. The *Draft OU-5 FS* rates Alternative 3 as “moderate” for the evaluation criterion of Reduction of Toxicity, Mobility, or Volume through Treatment. Because Alternative 3 simply moves some of the soil with PAHs above the target cleanup levels from one place to another, without using treatment to alter its toxicity, mobility, or volume in any way, this alternative should be rated “low”, as are Alternatives 1 and 2 (USEPA, *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final*, October 1989, pp 6-8 and 6-9).

5. The *Draft OU-5 FS*'s evaluation of the implementability criterion states "the proposed removal (*sic*) action is similar to the prior TCRA, so ... community acceptance should be relatively easy to achieve." This statement is inappropriate because:
 - a) it would more correctly be considered when the Community Acceptance criterion is addressed at the ROD stage of the decision-making process, and
 - b) no support is provided for the inference that simply because a community favors prompt removal of an immediate health risk, it would also favorably view a final remedy that would restrict use of the property and may compromise health.

6. The *Draft OU-5 FS* uses the terms "removal" and "remedial" interchangeably. To avoid confusion, the precise CERCLA meaning of these words should be respected.

Thank you for considering these comments. If you have any questions or need additional information, please call me or Peter Russell at (415)492-0540.

Sincerely,



Debbie Potter
Baser Reuse and Redevelopment Manager

cc: Aidan Barry, APCP
Ellen Garber, Shute, Mihaly Weinberger
Peter Russell, Northgate Environmental

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