



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

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ALAMEDA POINT
SSIC NO. 5090.3

Gray Davis
Governor

July 31, 2003

Mr. Mike McClelland
Department of Navy
Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

DRAFT BASE REALIGNMENT AND CLSOURE (BRAC) CLEANUP PLAN, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. McClelland:

The Department of Toxic Substances Control (DTSC) has reviewed the above referenced document dated April 7, 2003. Our comments are enclosed. If you have any questions, please contact me at 510-540-3767.

Sincerely,

Marcia Liao, Ph.D., CHMM
Hazardous Substances Engineer
Office of Military Facilities

enclosure

Mr. Mike McClelland

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cc: Andrew Dick, SWDiv
Steve Edde, Alameda Point
Mark Ripperda, EPA
Judy Huang, RWQCB
Dean Wright, DTSC
Elizabeth Johnson, City of Alameda
Peter Russel, Northgate Environmental
Randolph Brandt, LHF
Bert Morgan, RAB Co-Chair
Lea Loizos, Arc Ecology
Beth Kelly, Tetra Tech EMI

DTSC COMMENTS
DRAFT BRAC CLEANUP PLAN
ALAMEDA POINT, ALAMEDA, CALIFORNIA

1. The BCP states that there are three different programs: CERCLA, Total Petroleum Hydrocarbons (TPH)/RCRA, and Conveyance (Transfer) at Alameda Point (see Section 4 and page 3 of Section 1.3).

Please note that although releases of petroleum substances are regulated as Solid Waste Management Units (SWMUs) under RCRA and DTSC is the RCRA implementing agency, the cleanup of petroleum releases is overseen by the Regional Water Quality Control Board (RWQCB), with DTSC as the reviewing agency providing comments to RWQCB. The remainder of the RCRA program is overseen by the DTSC and contains two components: closure of RCRA regulated units (i.e. Part B and Interim Status facilities) and RCRA corrective action. These two components are overseen by DTSC Facility Permitting Branch and Office of Military Facility (OMF), respectively.

Given the difference in regulatory authority and agency oversight, TPH and RCRA are two very different programs. For clarity, please refer them as separate programs.

2. Page 13 states that in 1992 the RCRA Facility Assessment (RFA) identified 104 hazardous waste Generation Accumulation Points (GAPs) at NAS Alameda. This is incorrect. The RFA identified 104 Solid Waste Management Units (SWMUs) and/or Areas of Concerns (AOCs) of which some were GAPs. Please revise it accordingly.
3. Page 25, Section 4.3.1.1 states that the preliminary remediation criteria (PRC) and the TPH strategy were developed in agreement with RWQCB and DTSC. This is not exactly correct. DTSC is currently working with the Navy to have two previous DTSC comments addressed (the comments were issued on December 5, 2001 and April 25, 2002, respectively). To date DTSC has not concurred with the PRC or the TPH strategy.
4. Page 27, Section 4.3.2, states that the RFA listed *all* SWMUs and AOCs and identified *all* waste USTs, GAPs, RCRA Parts A and B facilities, and IR sites. It also states that Table 4-6 includes a list of *all* RCRA sites (permitted and non-permitted) identified at Alameda Point.

The OMF does not agree that all SWMUs/AOCs has been identified and listed in the RFA. Please refer to DTSC correspondence dated December 16, 2002 for further details.

5. Page 27, Section 4.3.2.1 states that RCRA sites at Alameda Point are undergoing either a closure process for Parts A and B permitted facilities or a recommendation for No Further Action (NFA) for the non-permitted areas identified in the RFA. This is potentially misleading.

All SWMUs/AOCs, identified in the RFA or after the RFA, are subject to RCRA corrective action. Currently SWMUS/AOCs that are not Parts A or B permitted (a.k.a. non-permitted as referred in the BCP) are being evaluated under either the CERCLA or the TPH program (DTSC is in the process working with the Navy to integrate, to the extent possible, RCRA corrective action with the CERCLA and TPH cleanup programs). Only sites deemed to pose no threat to human health and the environment will be recommended for NFAs. Please reword the subject section to avoid confusion.

6. Page 2, Section 4.3.2.2 is entitled *RCRA Closure Plan/Corrective Action and Closure Report*. However, no discussion of RCRA corrective action is provided.

Please note that Alameda NAS is a RCRA Part B permitted facility and the entire base from fence line to fence line is subject to RCRA corrective action. Whether addressed under the RCRA Parts A and B closure or the CERCLA or TPH program, all SWMUs/AOCs must be adequately investigated and remediated, if necessary. The Part B Permit cannot be terminated until all corrective action requirements are met.

Please provide adequate discussion of RCRA corrective action in this section.

7. Table 1-1: For DTSC community relations, please replace Patricia Ryan with Jesus Cruz, (510) 540-3927.