



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Arnold Schwarzenegger
Governor

July 18, 2006

Mr. Thomas L. Macchiarella, Code BPMOW.TLM
Department of the Navy
Base Realignment and Closure Program
Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310

REVIEW OF PROPOSED PLAN FOR IR SITE 1, 1943-1956 DISPOSAL AREA, FORMER NAVAL AIR STATION ALAMEDA, ALAMEDA COUNTY

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the Proposed Plan for Installation Restoration (IR) Site 1, 1943-1956 Disposal Area at the former Naval Air Station-Alameda, now known as Alameda Point (Proposed Plan). DTSC contacted the Navy in electronic mail (e-mail) correspondence dated June 16, 2006, and specified four overarching concerns regarding Site 1 as described in the Proposed Plan. The four points cited in the e-mail of June 16, 2006 are summarized below:

Selecting a four-foot soil cover rather than an engineered cap

DTSC requests that the Navy provide the rationale for selecting a soil cover rather than an engineered cap. The Navy should provide assurances that a four-foot soil cover will be protective of human health and the environment, and will not result in leaching of waste to the San Francisco Bay. We have been in communication with the Navy regarding this issue and have proposed an on-site meeting with the regulatory agencies to resolve this concern.

Installation of a Landfill Gas Monitoring System

Initial sampling in 2001 indicated that the landfill gas was near or above the lower explosive limit of methane. A second round of sampling yielded results much lower in

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methane concentration. A proposal to conduct additional sampling of landfill gases should be included in the Site 1 Proposed Plan.

Potential Migration of Waste into San Francisco Bay

DTSC is concerned that wastes deposited within Site 1 may migrate into the Bay, either as a result of seismic activity, or lateral displacement due to loading. Procedures the Navy will be following to ensure seismic and geotechnical stability should be provided to DTSC. Additionally, the lateral and vertical extent of the waste should be delineated to ensure that an adequate setback between the waste and the San Francisco Bay is obtained.

Applicable or Relevant and Appropriate Requirements (ARARs)

DTSC was concerned that the regulations found at Title 22 of the California Code of Regulations (CCR), Section 66264.90 (referred to as "Article 6"), were not included in the list of ARARs in the Proposed Plan. However, the Navy explained in subsequent discussion that Title 22 CCR 66264.117(b)(1)(A), which is included in the Proposed Plan, requires monitoring and reporting in accordance with Article 6. Therefore, the Navy does not need to respond again to this concern.

If you have any questions, please contact me at (916) 255-6449 or by e-mail at dlofstro@dtsc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Dot Lofstrom", with a long horizontal flourish extending to the right.

Dot Lofstrom, P.G.
Project Manager
Northern California Operations
Office of Military Facilities

cc: See next page.

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cc: Dr. Peter Russell
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