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Department of Toxic Substances Control

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August 23, 2006

Mr. Thomas L. Macchiarella, Code BPMOW.TLM
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REVIEW OF DRAFT PROPOSED PLAN FOR IR SITE 27, DOCK ZONE, FORMER NAVAL AIR STATION ALAMEDA, ALAMEDA COUNTY

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the draft Proposed Plan for Installation Restoration (IR) Site 27, Dock Zone at the former Naval Air Station-Alameda, now known as Alameda Point (Proposed Plan), and has the following comments.

GENERAL COMMENT

The Proposed Plan is written using overly-simplified language that fails to convey factual information about the site. In many places, the Proposed Plan text seems to be taken directly from the Executive Summary of the Final Feasibility Study Report from April 2006. While this language may have been appropriate for the Executive Summary, which had the supporting documentation attached, it is too superficial for a Proposed Plan. The Proposed Plan should be rewritten with more detail. Information should be provided about the nature and extent of contamination, for example, and it should be made clear to the reader why certain chemicals of concern have been retained and others (such as polynuclear aromatic hydrocarbons) have not been retained. DTSC recommends that the Navy revise the Proposed Plan and resubmit to the regulatory agencies as a working draft document, rather than as a Draft Final.

SPECIFIC COMMENTS

- 1) The U.S. Environmental Protection Agency specifically stated in their letter to the Navy dated April 20, 2006, that the Proposed Plan should provide support and clear reasoning for the decision to take no action for shoreline groundwater. The Proposed Plan promises on page 2 to discuss shoreline and inland groundwater further, but then merely states on page 6 that shoreline groundwater is not considered a potential drinking water source and does not pose a risk to surface water. Moreover, in their review of the Proposed Plan, the San Francisco Bay Regional Water Quality Control Board has requested that the Navy remove all references to shoreline groundwater not being a drinking water source. Thus, a clear, specific, and detailed rationale will need to be provided in the Proposed Plan to explain the decision to take no action for shoreline groundwater.
- 2) There is no mention of data gap sampling, there is no reference to Wash Down Area 166, and there is no reference to Building 555. These areas should be included in the Proposed Plan text with a statement that additional data gap sampling will occur during the remedial design phase.
- 3) Additional, pertinent details should be added to each description under "Previous Site Investigations". For example, the description under "Fuel pipeline removal (1998 – 1999)" on page 3 states that soil and groundwater sampling occurred but does not include any indication of analytical results. This comment should be applied to all paragraphs under "Previous Site Investigations," and is not meant only for the "Fuel pipeline removal" paragraph.
- 4) Potential sources of contamination in soil and groundwater are identified as both historical and current operations at Site 27. Is the Navy suggesting that the current occupants of Buildings 68, 168 and 601 are releasing contaminants to soil and groundwater?
- 5) Table 2 lists different remedial action objectives (RAOs) for the same chemical based on either the California Toxics Rule criterion or the Maximum Contaminant Level. Although the basis for each RAO is defined in the footnotes associated with the table, the reader is left uncertain and confused about the different RAOs for the same chemical. This explanation should be pulled out of the footnotes and provided, with more detail, in the main text.
- 6) The Proposed Plan does not provide adequate explanation regarding arsenic in soil and groundwater. On page 5, the Proposed Plan states that the primary risk driver in soil is arsenic but then states that arsenic is present at concentrations comparable to background. This statement may be interpreted by the general

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public as a contradiction. A more complete explanation should be provided for arsenic in soil. Additionally, a RAO of 10 micrograms per liter for groundwater is proposed for arsenic, but there is no accompanying discussion of arsenic as a chemical of concern. It is not clear from the Proposed Plan whether the remedial alternatives are intended to include arsenic or not.

- 7) The explanation for Figure 3 states that isoconcentration contours for volatile organic compounds (VOC) are presented in micromoles per liter. This is an unnecessarily sophisticated approach that should not be used in a proposed plan. Instead, the concentration of VOCs in groundwater should be depicted using the industry standard of micrograms per liter rather than micromoles per liter. Additionally, this figure should be enlarged so that the concentration of VOCs in groundwater and other details are easily read.
- 8) The large font used in the Proposed Plan adds to the general feeling that one is reading a primer rather than a document that is purportedly supplying the public with the selected remedy for groundwater contamination after years of intensive investigation. In contrast, the small font on Figure 3 makes the map difficult to read and downplays the importance of this diagram.

SUMMARY

As stated in the paragraph under "General Comments," the Proposed Plan for Site 27 needs extensive revision. More detailed and thoughtful explanations should be provided. DTSC recommends that a "working draft" revised Proposed Plan for Site 27 should be submitted to the regulatory agencies, rather than a Draft Final.

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

Sincerely,



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cc: See next page.

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