



Linda S. Adams
Secretary for
Environmental Protection



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ALAMEDA POINT
SSIC NO. 5090.3

Department of Toxic Substances Control

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Arnold Schwarzenegger
Governor

September 6, 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 draft final 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), and has the following comments.

General Comments

1. The paragraph entitled "Site-Specific Dose Summary" needs to be revised so that it is evident that the paragraph refers to radiation exposure. This may be accomplished by rewriting the first sentence in the paragraph or perhaps incorporating some of the information from Human Health Dose Assessment paragraph. For example, the first sentences could be rewritten as follows:

"According to the Nuclear Regulatory Commission, action is warranted for sites where the radiation dose exceeds 25 millirems per year. Radiation dose (or dose) is a term that means total effective dose equivalent (TEDE)."

2. United States Environmental Protection Agency (U.S. EPA) comments 1, 3, 4, and 5 have not been incorporated into the Proposed Plan. DTSC supports and

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agrees with these comments submitted by U.S. EPA and would like to see the Proposed Plan modified, accordingly.

3. In our memorandum dated August 9, 2006, DTSC recommended that the Navy should design a third alternative, which would be a non-prescriptive cap that would retard but not necessarily prevent the downward movement of surface water. The purpose of this comment is to reiterate our recommendation; the Proposed Plan does not need to include this statement.

Minor editorial comments:

1. Public comment period page 2 is listed as August 14 through September 13, 2006.
2. Remove unnecessary "s" in dose assessments (page 4).
3. Capitalize "f" in Fall 2006 in TCRA box on page 16.
4. Under the third bullet titled radium-impacted soil (under Remedial Action Objectives) all the acronyms are spelled out, even though they have been defined earlier in the document. This may be deliberate, however, and I certainly don't object if it was intended. In fact, TEDE is defined every time it is used in a new paragraph throughout the Plan (page 4, page 5, and page 6) but that may be because it's assumed this will be an acronym that is unfamiliar to most readers of the Proposed Plan.

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

Sincerely,



Dot Lofstrom, P.G.
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cc: See next page.

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