

Alameda Reuse and Redevelopment Authority

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Beverly Johnson
Mayor, City of Alameda
City of Alameda

November 9, 2006

Marie Gilmore
Councilmember/Community
Improvement Commissioner
City of Alameda

Mr. Thomas L. Macchiarella
BRAC Environmental Coordinator
Navy BRAC Program Management Office
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Tony Daysog
Councilmember/Community
Improvement Commissioner
City of Alameda

Frank Matarrese
Councilmember/Community
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Re: Comments on the September 2006 *Proposed Plan for IR Site 1, 1943-1956 Disposal Area, Former NAS Alameda*

Doug deHaan
Councilmember/Community
Improvement Commissioner
City of Alameda

Dear Mr. Macchiarella:

Thank you for the opportunity to comment on the Navy's September 2006 *Proposed Plan for IR Site 1, 1943-1956 Disposal Area, Former NAS Alameda (PP)*. The ARRA (Alameda Reuse and Redevelopment Authority) offers the following two comments.

Debra Kurita
City Manager/
Executive Director

1. **Two of the PP's proposed institutional controls are overly broad and should not be included in the ROD.** The *PP* proposes to establish institutional controls that would prohibit certain activities in areas where contamination has not been found. Specifically:
 - *Prohibit* demolition activities (including paved surfaces), unless transferees gain regulatory and Navy approval and comply with a risk management plan [even outside the boundary of the landfill].
 - *Restrict* excavation and/or disturbance of soil in areas within the boundary of *IR Site 1*, but outside the boundary of *Area 1A* [the landfill], unless transferees gain regulatory and Navy approval and comply with a risk management plan. (*PP*, p. 7)

The Navy's *PP* proposes removal of all soil contamination in areas outside the landfill:

- Area 1 soil contamination is documented by historical aerial photographs of the landfill (Area 1A) and by sampling in the burn area (Area 1B). Wastes in the burn area are proposed for excavation, but the Navy proposes to leave the landfilled wastes in place.

- In Area 2 (the runways, taxiways, and other paved areas) no soil contamination has been observed.
- In Area 3 (the unpaved areas outside of the former disposal areas) surface soil contamination by PAHs (polynuclear aromatic hydrocarbons), PCBs (polychlorinated biphenyls), metals, and radium is present in hot spots. No soil contamination was found in any of the eight deeper soil samples from this area. The *PP* proposes removal of all Area 3 soil hot spots.
- Area 4 (the pistol range berm) is proposed for complete excavation. This remediation eliminates the PAHs, PCBs, and MEC (munitions and explosives of concern) contamination that has been observed in this area's soil.
- In Area 5 (the shoreline) surface soil is contaminated with VOCs (volatile organic compounds), SVOCs (semivolatile organic compounds), PCBs, metals, and radium in hot spots. None of the three deeper soil samples was contaminated. The *PP* proposes excavation of all Area 5 soil hot spots.
- Radium contamination occurs in shallow soil across much of IR Site 1. The *PP* proposes excavation of all radium hot spots beyond the landfill boundary.

The Navy collected eight soil samples from Area 3 from below 2 feet bgs (below ground surface) and three soil samples from Area 5. Although the Navy analyzed these samples for a wide suite of analytes, none of the soil samples from deeper than two feet bgs in IR Site 1 (other than in Area 1) exceed any USEPA PRGs (Preliminary Remediation Goals). Therefore, the remedial investigation does not provide a basis for any remediation, including institutional controls restricting or prohibiting disturbance of soil or pavement.

The remedial investigation provides no rationale for concluding subsurface soil in IR Site 1 is any different from subsurface soil elsewhere in the runways area. Significantly, neither the Navy nor any environmental regulatory agency has identified the need for similar institutional controls on any other portions of the runways area. If the Navy believes subsurface soil contamination might be present in IR Site 1 (outside of the landfill), from which public health should be protected, the Navy should investigate the issue, rather than simply impose institution controls. Potentially overly protective institutional controls should not substitute for thorough investigation. Remedial Alternatives S2-3 (a preferred alternative), S2-4, S3-4 (a preferred alternative), S5-4 (a preferred alternative), S5-5, and S5-6 are all impacted by this issue. These alternatives generally require institutional controls restricting contact with subsurface soils, even after the Navy remediates the surface soil, which contains all known soil contamination. Imposing the burden of institution controls on land that does not require remediation is not a cost-effective remedy, nor is it consistent with spirit or letter of the CERCLA process.

2. **The Navy should remove all wastes from the IR Site 1 landfill, with off-site disposal.**

At its November 1, 2006 meeting, the ARRA Board acted to adopt two positions:

- Alternative S1-5 (complete removal of wastes in the landfill) is the preferred remediation for soil in Area 1, and
- Alternative S1-4a (soil cover on the landfill) is unacceptable remediation for soil in Area 1.

Among the considerations favoring Alternative S1-5 are:

- The Navy has never characterized wastes buried in the Area 1 landfill by sampling or other observation. This landfill was the primary waste disposal location for the Naval Air Station Alameda from 1943 until 1956. The base generated large amounts of hazardous wastes during this time, many of which have caused extensive soil and groundwater contamination elsewhere on Alameda Point. It is reasonable to assume similar wastes are buried in Area 1. The landfill probably contains containerized wastes (drums), which when they deteriorate to the point of failure will release mobile contaminants. Once they migrate from the landfill, these wastes likely will constitute unacceptable risks to human health and the environment. Such wastes should be excavated and disposed of offsite before this occurs.
- The landfill is very close to San Francisco Bay and the Oakland Inner Harbor. Earthquakes, tsunamis, storm surges, and long-term shoreline erosion could lead to hazardous wastes reaching these water bodies. If the wastes were disposed offsite, aquatic habitats in the area would be protected from these hazards.
- The *PP* proposes to remediate contaminated groundwater flowing from the landfill toward San Francisco Bay using in situ chemical treatment. However, buried wastes will continue to recontaminate the groundwater, unless the source of the groundwater contamination—the landfill—is removed. The Navy likely will need to continue groundwater remediation for the foreseeable future because the source of contamination is still present. Excavating the landfill with offsite disposal allows permanent groundwater cleanup.
- Future land use of the landfill footprint will be complicated and more costly because buried hazardous wastes are present. The planned future use of the landfill is a golf course. Design, maintenance, and operation of the golf course will be more difficult due to the wastes, for example, topographic contouring, irrigation, landscape planting, the acceptability and placement of water hazards, accommodation of wells for landfill monitoring, etc. If the landfill were excavated and disposed offsite, routine design, maintenance, and operation of the golf course could occur.

Mr. Thomas L. Macchiarella

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- The public's enjoyment of this area will be lessened by the presence of a hazardous waste landfill. Some potential users of this planned segment of the Bay Trail may avoid the area for fear of the wastes. Regardless of whether such fears are justified, the public's recreational use of park areas should not be compromised by buried wastes, unless necessary.

As stated in ARRA's comments on earlier IR Site 1 documents, an engineered cap (Alternative S1-4b) is a better remedial alternative than a soil cover. An engineered cap is the standard method of topping a hazardous waste landfill.

It is highly uncertain that a soil cover will be effective into the future, especially if container failure releases drummed wastes into the groundwater. If groundwater migration from the landfill worsens for this or any other reason, the environmental regulatory agencies likely would require the Navy to upgrade the soil cover to an engineered cap. An engineered cap will be much more effective than a soil cover in preventing precipitation from percolating into the landfill. Excluding percolation of precipitation into the landfill is one important method of minimizing leachate formation and subsequent migration.

Retrofitting an engineered cap will severely disrupt golf course operations. The public will lose its use of the golf course, and the golf course will lose revenues. The proposed soil cover alternative (S1-4a) is only twenty-five percent less expensive than the engineered cap alternative (S1-4b). This marginal cost is outweighed by the marginal benefit of uninterrupted golf course operations.

Thank you for considering the ARRA's comments. If you have any questions or need additional information, please call me, or Peter Russell, at 415-492-0540.

Sincerely,



Debbie Potter
Acting Alameda Point Project Manager

cc: ARRA Board
Mark Ripperda, USEPA
Judy Huang, RWQCB
Dot Lofstrom, DTSC
Peter Russell, Russell Resources, Inc.