



California Regional Water Quality Control Board

San Francisco Bay Region



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ALAMEDA POINT
SSIC NO. 5090.3

Arnold Schwarzenegger
Governor

Date: NOV 21 2006
File: 2199.9285(EWS)

Department of the Navy
Base Realignment and Closure Program Management Office West
ATTN: Thomas L. Macchiarella
1455 Frazee Road, Suite 900
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Subject: Comments on the Draft Work Plan for Supplemental Remedial Investigation Sampling at Operational Unit 2C, Alameda Point, Alameda, California

Dear Mr. Macchiarella:

Upon review of the *Draft Work Plan for Supplemental Remedial Investigation Sampling at Operational Unit 2C*, dated September, 2006 (Draft Work Plan) we have the following comments:

#	Page	Section	Comments
G1		General	Petroleum Screen Criteria – Please use the appropriate screening criteria for all TPH program constituents as established in the <i>Interim Final Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater</i> prepared by the San Francisco Bay Water Board dated February 2005 (ESLs).
S1	1-1	Section 1	Bullet labeled “12 data gap areas” - The buildings listed for IR Site 5 includes Building #34, which seems to be located in IR Site 12, based on Figure 2-1. Also, buildings 282 and 415 are listed here, but not on Figure 2-1. Please correct this discrepancy.
S2	2-13	2.2.3	Underground Storage Tank table – USTs 10-1 through 10-6 are listed as removed in this table, whereas in the <i>Underground Storage Tank Summary Report (4/10/03, Tetra Tech)</i> these tanks are listed as closed in place and filled with sand. Please address this discrepancy.
S3		Figure 1-2	IR Sites 8 and 26 are shown in this Site Location Map for OU-2C, even though they are not part in OU-2C? Please remove reference to sites 8 and 26. Figure 1-2 in Attachment A needs to be corrected as well.

#	Page	Section	Comments
S4		Figure 2-1	The zoomed out map on the upper right corner of this figure makes it look like Alameda Point is floating in the San Francisco Bay without the rest of Alameda attached. Please fix this map so it looks correct.
S5		Attachment A	Table 1-2 – Evaluation Area 3 – At the 10/17/06 Alameda Point BCT meetings, there was discussion about DNAPL Plume 5-3 being within evaluation area 3. Why are only 2 groundwater samples proposed to be taken within evaluation area 3?
S6		Attachment A	Table 2-2 - Some analytes shown in this table have Target Method Reporting Limits above ESLs (These analytes were called out with footnote 'f'). Please include a section in the report that discusses why these constituents are being analyzed using methods with detection limits above screening levels. See comment #S8 also.
S7		QAPP Worksheets	QAPP Worksheet 3 - Please update the distribution list so that the Water Board project manager is Erich Simon, (510) 622-2355, ersimon@waterboards.ca.gov.
S8		QAPP Worksheets	QAPP Worksheet 15 – Soil - Some analytes shown in this table have Project Quantitation Limits and Method Detection Limits above ESLs (These analytes were called out with footnote 'e'). Please include a section in the report that discusses why these constituents are being analyzed using methods with detection limits above screening levels.
S9	A1-31	A1.2.2.1	EBS, 2001 Soil and Groundwater Sampling – Please include at what depths the Phase 2B HydroPunch groundwater sampling occurred at. Also, please define what 'elevated concentrations' means in the third to last sentence (above PRGs or ESLs?)
S10		Table A1-1	Appendix A1 – MCLs for Chromium – The MCLs for chromium listed are 100 ug/L for Federal MCL and 50 ug/L for California Modified MCL. Please specify these MCLs are for Total Chromium.
S11		Table A1-6	2001 result for FWBZ Wells M05-03, M05HW-01, M10-01 – The gasoline result listed here shows that 486,000,000 ug/kg were measured. Please confirm that this is correct, and if so, include a footnote to discuss this measurement.
S12		Table A1-9	Table – Please specify if chromium results that are presented are total chromium, chromium III, or chromium VI.

- 3 -

Please contact me at (510) 622-2355 or email ersimon@waterboards.ca.gov if you have any questions.

Sincerely,



Erich Simon
Project Manager

CC (via US Mail and email):

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