



California Regional Water Quality Control Board

San Francisco Bay Region



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ALAMEDA POINT
SSIC NO. 5090.3

Arnold Schwarzenegger
Governor

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Department of the Navy
Base Realignment and Closure Program Management Office West
ATTN: Thomas L. Macchiarella
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Subject: Comments on the Draft Record of Decision for Operable Unit 1, IR Sites 6, 7, 8, and 16, Alameda Point, Alameda

Dear Mr. Macchiarella:

Upon review of the *Draft Record of Decision for Operable Unit 1 Installation Restoration Sites 6, 7, 8, and 16, Alameda Point, Alameda, California*, dated August 2006 (Draft ROD) we have the following comments:

#	Page	Section	Comments
S1	D-3		Description of the Selected Remedy – Top paragraph – This paragraph states that concentrations of hazardous substances at Sites 7 and 8 are low and do not pose an unacceptable risk. While contaminants addressed by the CERCLA program may be low, TPH compounds associated with these sites could pose an unacceptable risk for current or future site users. This statement could be misinterpreted to mean that all contaminants at these sites are low, please clarify. Also, please include language to clarify how these sites will be addressed by the Alameda Point TPH program. At a minimum, include reference to related documents and refer the reader to appropriate contacts.
S2	D-6		Data Certification Checklist – Second checklist item – While the groundwater at sites 6 and 16 may not be currently used as a drinking water source, the selected remedies need to be protective of this beneficial use. Fourth Checklist Item – This item mentions that the remedies for Sites 6 and 16 will allow for unrestricted use of these sites, whereas the second checklist item suggests the selected remedies will allow for commercial/industrial use. Please resolve this discrepancy.

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S3	1-1	1.1	Site Name and Location – Please include a brief discussion explaining why these four geographically separated IR Sites are considered together in this single Draft ROD.
S4	2-6	2.2.2.1	Storm Sewer Removal Action, 1997-1998 – Last Paragraph – The two sentences in this paragraph seem to contradict each other. “...industrial activities affecting storm sewer system were conducted...including activities associated with hydraulics, brakes, ...” and “No significant discharges to the storm sewer system resulted from industrial activities...”. Please resolve this potential discrepancy. If no significant discharges occurred, adding the word “potential” in the first sentence so it reads, “In Parcel 196, industrial activities potentially affecting storm sewer system...” would work.
S5	2-7	2.2.2.1	Basewide Groundwater Monitoring, 2002-2005 – Last Paragraph - This paragraph mentions that no screening criteria are established for TPH. Screening criteria for all TPH program constituents are 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). Please revise document to include these screening criteria. This comment also applies to the appropriate sections for Sites 7, 8, and 16.
S6	2-10	2.2.2.2	RCRA Investigation Activities – Second Paragraph from top – This paragraph mentions that regulatory agencies determined that no further action was required for NAS GAP 25. Please reference necessary documentation to support this claim. Also address in Section 2.4 on page 2-14, and throughout document as necessary.
S7	2-11	2.2.2.4	TPH Investigation Activities - Last sentence – This sentence mentions that contaminant plumes associated with Fuel Line CAA-B are addressed under the cleanup programs for the sites where they occur, but does not mention where in relation to OU-1 sites those potential plumes are located. Please briefly summarize where the plumes associated with Fuel Line CAA-B are located describe their proximity to OU-1 IR Sites, and discuss in detail where these plumes may overlap with IR Sites at OU-1. On the following page, the last sentence in the top paragraph mentions that the Navy recommended no further action for the Fuel Line CAA-B, but does not discuss the contaminant plumes mentioned in the previous paragraph. Please clarify.

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S8	2-16	2.5.3.1	Site 6 Soil –The paragraphs in this section state there is no problem associated with IR Site 6 Soil, but remedial work is still recommended. Please resolve this discrepancy. Also in section 2.7.1.3 on page 2-23.
S9	2-17	2.5.3.1	Site 6 Soil – Last Paragraph – Please specify what type of contamination at Site 6 may be attributed to the offsite oil water separators, OWS 040A and 040B.
S10	2-19	2.6.2	Current and Potential Groundwater Uses – While the groundwater may not currently be used for drinking water purposes, the selected remedy still needs to be protective of potential future beneficial uses, including drinking water, as the groundwater does not meet the exemption criteria specified in State Board Resolution 88-63. Please revise this section to reflect that the drinking water beneficial use needs to be protected. Furthermore, delete reference to the Water Board Resolution 00-024 and the Water Board letter dated 7/21/03. Resolution 00-024 was never approved by the State Water Board. The 7/21/03 letter identified the groundwater west of Saratoga Street to not be a potential source of drinking water. As all the IR Sites associated with OU-1 are east of Saratoga Street, including this information is misleading.
S11	2-25	2.8.2	Site 6 Groundwater – This seems to be the first place that the document identifies the groundwater below Site 6 to be a potential drinking water source. Please include this discussion earlier, specifically in section 2.6.2
S12	Figures 2-3, 3-2, 4-2, 5-2		Conceptual Site Models - Please provide justification for why future on-site workers were not identified as potential receptors through the ingestion of groundwater pathway. Also explain in the appropriate narrative sections why consideration of ecological receptors did not include the Outdoor Air/Fugitive Dust, Outdoor Air, or Dermal Contact pathways.
S13	Figure 2-4		If contamination is identified at OWS-040A or OWS-040B, both of which are located out of the Site 6 boundary, how will they be incorporated into the CERCLA cleanup program?
S14	Figure 2-5		The letters in several boxes in this flow chart overlap with one another. Please edit boxes appropriately

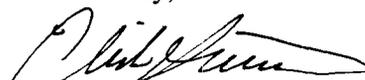
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S15	Table 2-6, 3-5		When reporting chemicals detected in soil or groundwater, please also include the number of samples and the frequency of detections above PRGs.
S16	3-6	3.2.2.1	Site 7 Supplemental Investigation, 2003 – Second Paragraph, last sentence - Typo. Revise this sentence to include the word ‘not’ as follows: “...it was believed that the debris layer may not consist of incinerator debris but rather building debris”.
S17	3-8	3.2.2.3	EBS Activities – Third Paragraph – The Phase 2B sampling event was described, but no results were discussed. Please include a brief summary of results associated with the Phase 2B sampling event.
S18	3-10	3.2.2.4	Corrective Action Investigation, 2001 – Second Paragraph – This paragraph described a dual vapor extraction system that was designed to remove free product and MTBE. Please include more specifics on the remedial action progress and an estimated time to completion.
S19	3-12	3.5.3.1	Debris soil Area – First Paragraph – The following sentence is confusing: “All of these chemicals were infrequently detected at concentrations below PRGs.” Does it mean the chemicals were frequently detected <u>above</u> PRGs, or infrequently detect, but when they were detected, they were below PRGs. Please clarify.
S20	3-13	3.5.3.2	Site 7 Groundwater – Just because petroleum-related products may have contributed to the mobilization of non-petroleum compounds doesn’t mean the non-petroleum compounds associated with this site shouldn’t be considered under the CERCLA program and transferred to the TPH program. Please provide further rationale and justification for recommending no further action for the potentially commingled groundwater contamination at this site.
S21	3-23	3.12.1	Summary of the Rationale for the Selected Remedy – If the Navy has determined that soil and groundwater sampling is required beneath and adjacent to OWS459 and within debris area, why is no further action recommended for groundwater at IR site 7?

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S22	Tables 2-6, 3-6, 4-6, 5-6, 6-6		Please ensure the units are correct for the Tap Water PRGs for all constituents listed. In Tables 2-6, 3-6, and 6-6 the Tap Water PRG for Arsenic is shown as 0.045 ug/L. In Table 4-6 it's shown as 0.45 ug/L.
S23	4-5	4.2.2.1	CERCLA Investigations – Storm Sewer Removal Action 1997-1998 – Last Paragraph – Please discuss the VOC plumes associated with Building 114 in more detail. As the Storm sewer system was identified as the most likely transport mechanism for these plumes, discuss of the nature and extent of the plumes. Are the plumes mentioned here stable? What VOC concentrations were reported? Please elaborate.
S24	4-6	4.2.2.1	CERCLA Investigations – Basewide Groundwater Monitoring, 2002-2005 – Third Paragraph – This paragraph mentioned that benzene concentrations have been increasing at the monitoring well located to the north of Site 8. Have any further investigations been conducted or planned to evaluate the source of this contamination? The increasing concentrations might be indicative of a continuing source of contamination that has not been remediated. Please elaborate on the action taken or to be taken to address this issue.
S25	4-8	4.2.2.2	RCRA Investigation Activities – Second and Third Paragraphs – Benzene was detected above MCLs at OWS114, and further action for OWS 114 and WD 114 was recommended in the FS report. Please include rationale for recommending no further action for groundwater in this draft ROD.
S26	4-11	4.5.3.1	Site 8 Soil – Third and Fourth Paragraph – These paragraphs present an argument for no further action to address PAH SVOCs, based on the sporadic detections being vertically and horizontally bound by samples detected at concentrations below screening levels. They also mention that the pattern of detections are not indicative of a non-petroleum release. While previous investigations may suggest that no specific non-petroleum releases occurred, the risks associated with these contaminants are still a concern and should be included in risk-based evaluations of the site.

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S27	Tables 2-9, 3-8, 4-8, 5-8		Summary of Site 8 BHHRA Results – Clearly indicate if BHHRA results presented in this table include total or just incremental risks associated with the sites. If total risks are not represented here, please include them for comparison. Also, for Table 4-8, please include further justification for why no further action was recommended for Site 8 groundwater, considering the high cancer and non-cancer hazards determined for potential residential users of Site 8 groundwater.
S28	5-7	5.2.2.1	Basewide PAH Investigation, 2003 - This paragraph details how many samples were collected at Site 16, but does not discuss the results at all. Please include a brief discussion of the results of this investigation pertinent to Site 16.
S29	5-12	5.5.3.1	Site 16 Soil – second paragraph from top – This paragraph mentions that only VOCs associated with petroleum contamination were present in Site 16 soil, but does not indicate how these elevated concentrations of petroleum-related VOCs will be addressed. Furthermore, the soil risk characterization section (Section 5.7.1.3) does not seem to include consideration of these VOCs. Please discuss how these contaminants will be addressed. Furthermore, risks associated with these compounds should be included in the risk assessment process, along with CERCLA contaminants, in order to develop an overall risk for the site.
S30	Figure 5-1 & 5-3		Site 16 boundaries in these two figures are different. Please resolve this discrepancy. Also, from Figure 5-3, it looks like some contamination at Site 16 may be attributed to AST 620. Please include groundwater flow direction on this map and include discussion in the appropriate narrative section on the potential contamination associated with AST 620. Is this AST in another IR Site or Corrective Action Area? What are the contaminants associated with this AST?

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

Sincerely,



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Project Manager

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