



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

N00236.002714
ALAMEDA POINT
SSIC NO. 5090.3

May 18, 2000

Mr. Richard Weissenborn, Code 5090
Department of the Navy
Southwest Division
1220 Pacific Highway
San Diego, CA 92132-5190

RE: Determination of the Beneficial Uses of Groundwater, Alameda Point

Dear Mr. Weissenborn:

EPA received the draft final version of the above referenced document, submitted by the Navy and prepared by Tetra Tech EM Inc., on April 7, 2000. We appreciate the Navy's willingness to work with EPA in development of the Groundwater Beneficial Use document and commend this latest version of the document. Most of the document addressed the concerns EPA expressed in previous versions and reflected the content of EPA's letter to the Navy dated January 3, 2000. A few changes, described in the attached comments, need to be made to the document before it is finalized.

Please call me at (415) 744-2367 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Anna-Marie Cook".

Anna-Marie Cook
Remedial Project Manager

cc: Michael McClelland, BEC SWDiv
Michael Bloom, SWDiv
Mary Rose Cassa, DTSC
Brad Job, RWQCB
Adam Klein, TechLaw Inc
Mary Sutter, RAB Co-Chair
Liz Dodge, City of Alameda
Ted Splitter, City of Alameda

attachment

EPA Comments
on
Determination of the Beneficial Uses of Groundwater, Alameda Point

Section 4.0, first paragraph:

1. Please delete the phrase “limited source of freshwater” . In many cases the impact of “leaking pipes” is speculative and simple rainfall calculations for a given area show that infiltration is a significant contributor to recharge even in the Base’s current highly paved condition.
2. Delete “risk caused by ambient metals concentrations”. The Navy is not responsible for the risk posed by ambient conditions. By the same token, ambient conditions are not to be used as a justification for not taking action when other types of contaminants are present.

Section 4, Western Region paragraph:

3. Delete the bullet “Recharge and safe yield will decrease as utility pipes are repaired”. No blueprints of water piping have been shown for the Western Region and no sources of leaking have been documented. The concept of the leaking pipes in this area is mostly speculative, as are the schematics showing leaks, and so lends no credibility to the site specific arguments for this area.
4. Delete the bullet “Costly pretreatment of groundwater required as ambient metals ...” Navy would not be responsible for remediating the ambient metals concentrations as part of the CERCLA clean up and so this argument is irrelevant. It is important to be aware of the distinction between concentrations of ambient contaminants and concentrations of anthropogenically released contaminants. The aquifers do not need to be remediated beyond the levels of ambient concentrations for inorganic contaminants. However, organic contaminants, pesticides and PCBs need to be remediated to the appropriate CERCLA clean up levels. In other words, even if high levels of inorganics are naturally occurring in the aquifer and even if the presence of these metals poses a risk to any receptor, it does not preclude the aquifer from being considered a potential drinking water source and does not reduce the level of clean up needed for all other anthropogenically placed contaminants present within the aquifer.
5. I would suggest adding a bullet that states that the planned reuse is a golf course which would carry restrictions against digging and therefore limit access to the groundwater.
6. Pg 6, Section on Central Region, second sentence: Change “exceeding” to “exceed”.
7. Pg 7, last bullet: Delete the bullet “Costly pretreatment of groundwater required as ambient metals ...” Navy would not be responsible for remediating the ambient metals concentrations as part of the CERCLA clean up and so this argument is irrelevant. It is important to be aware of the distinction between concentrations of ambient contaminants and concentrations of anthropogenically released contaminants. The aquifers do not need to be remediated beyond the levels of ambient concentrations for inorganic contaminants.

However, organic contaminants, pesticides and PCBs need to be remediated to the appropriate CERCLA clean up levels. In other words, even if high levels of inorganics are naturally occurring in the aquifer and even if the presence of these metals poses a risk to any receptor, it does not preclude the aquifer from being considered a potential drinking water source and does not reduce the level of clean up needed for all other anthropogenically placed contaminants present within the aquifer.

8. pg 7, second paragraph, first sentence: Add the following phrase to the first sentence so that it reads: "In consideration of the other mitigating factors and property reuse, the BCT has concluded that groundwater beneath Sites 5, 6, 7, 8, 10 and 25 is unlikely to be used as a potential drinking water source, although contaminant mass reduction is required to facilitate long-term contaminant attenuation **and allow for other beneficial uses of the groundwater.**"
9. Pg 8, Section Southeastern Region: Please delete the last sentence in the paragraph immediately preceding the bullets, delete all the bullets on this page, and also delete the first sentence of the paragraph immediately following these bullets. There is nothing to be gained by listing out an ad hoc list of "site-specific" criteria (exactly the same site-specific criteria that was used to justify not going to MCLs for CERCLA cleanup criteria on the Central and Western portions of the base) and the result is simply to weaken the impact of the site-specific arguments used for the rest of the Base. The same criteria just don't apply to the Southeastern Region, so why not state up front that MCLs will be used as cleanup criteria to protect the Merritt Sand aquifer?
10. Pg 9, first paragraph, fourth sentence: Revise this sentence to read: "This determination means that **alternatives to remediate** contaminated groundwater beneath and migrating from Sites 3, 4, 9, 11, 13,16, 19, 21, 22, and 23 should **use** MCLs as cleanup goals."
11. Pg 9, Section Summary, second sentence: Revise to read: "**For the purpose of CERCLA clean up decisions**, groundwater in the western and central regions of Alameda Point is unlikely to be used as a potential source of drinking water."
12. pg 9, Section Summary, third sentence: This sentence doesn't make sense. The phrase "mitigate exposure pathways" should be revised so that the sentence reads: "Remedies and cleanup goals selected for groundwater in the western and central regions must **ensure that threats posed by such exposures as inhalation (groundwater vapors into soils and from soils into residences), dermal contact, and those associated with irrigation use are eliminated, and any significant ongoing degradation of the groundwater from contaminant migration is prevented.**"