

**RESPONSES TO REGULATORY AGENCY COMMENTS ON THE
DRAFT RECORD OF DECISION FOR OPERABLE UNIT 1, INSTALLATION
RESTORATION SITES 6, 7, 8, AND 16, ALAMEDA POINT, ALAMEDA, CALIFORNIA**

This document presents the U.S. Department of the Navy's (Navy) response to comments (RTC) from the regulatory agencies on the "Draft Record of Decision [ROD] for Operable Unit 1 [OU-1], Installation Restoration [IR] Sites 6, 7, 8, and 16, Alameda Point, Alameda, California," dated August 2006. The comments addressed below were received from the U.S. Environmental Protection Agency (EPA) on December 4, 2006; the San Francisco Bay Regional Water Quality Control Board (Water Board) on December 7, 2006; and from the Department of Toxic Substances Control (DTSC) on January 11, 2007.

RESPONSES TO COMMENTS FROM EPA, ANNA-MARIE COOK, REMEDIAL PROJECT MANAGER

General Comments

1. **Comment:** The Navy has agreed to change the soil RAOs for Sites 6 and 16 as follows: "Minimize the potential risk of exposure (through ingestion or dermal contact) of a commercial worker to COCs in soil and either prevent exposure (through ingestion or dermal contact) of future residents to COCs in soil or prohibit residential use of the property." Because we have agreed to this revision during the review period, EPA is not providing comments on the RAOs for soil for Sites 6 and 16, except for R9 ORC comment # 6, which reiterates this general comment.

Response: This comment is noted. The agreed upon language will be added to the text with the following edit: the phrase "unacceptable levels of" will be inserted before both uses of "COC" (the acronym for "chemicals of concern").

Based on this edit, the remedial action objectives (RAO) for soil at Sites 6 and 16 (presented in Sections 2.8.1 and 5.8.1, respectively) will be revised as follows: "Minimize the potential risk of exposure (through ingestion or dermal contact) of a commercial worker to unacceptable levels of COCs in soil and either prevent exposure (through ingestion or dermal contact) of future residents to unacceptable levels of COCs in soil or prohibit residential use of the property."

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

Specific Comments

- 1. Comment:** Page D-2, third bullet: It seems that this third bullet is part of the second bullet related to IR-07 soil removal. If there is a reason to distinguish it from the soil removal proposed in the second bullet, please clarify and elaborate.

Response: The second bullet refers to sampling at OU-1 Sites 6, 7, 8, and 16 to evaluate the nature and extent of potential soil contamination. The third bullet will be revised as follows: "Excavate soil contamination within the debris area at IR Site 7 and in the northeast corner of IR Site 8 for chemical concentrations exceeding remediation goals."
- 2. Comment:** Page D-3, first paragraph, last sentence: Revise to read "Groundwater at IR Sites 7 and 8 is contaminated by total petroleum hydrocarbons (TPH) and is being remediated under the Alameda Point TPH program.

Response: The last sentence will be modified as requested.
- 3. Comment:** Page D-4, first paragraph after bullets: Change the words "no further action" for the SWMUs to "closure".

Response: Because solid waste management units (SWMU) are not permitted Resource Conservation and Recovery Act (RCRA) regulated units, RCRA closure regulations for regulated units do not apply. The text will be revised to clarify that Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) soil remedies presented in the ROD are intended to address the actions necessary to obtain no further corrective action status for the SWMUs under RCRA. The second sentence in the first paragraph after the bullets will be revised as follows: "The selected CERCLA soil remedies for IR Sites 6, 7, 8, and 16 at Alameda Point within this ROD are intended to address the additional actions necessary to fulfill CERCLA requirements and obtain "corrective action complete" status for the following 11 SWMUs:"
- 4. Comment:** Page D-6, second checklist item, last sentence of "description": After remediation goals have been achieved, Sites 6 and 16 will allow for commercial/industrial and residential use of Sites 6 and 16. This wording makes the description consistent with the item (1) in the description under the last checklist item.

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

Response: The last sentence will be revised as follows: "For IR Sites 6 and 16, the remediation goals, once achieved, will not only allow for commercial/industrial use, but also potentially achieve unrestricted use."

5. **Comment:** Page D-7: Please include "Mr." before Bruce H. Wolfe for the RB.

Response: "Mr." will be added before "Bruce H. Wolfe" on page D-7.

6. **Comment:** Page 2-1, Section 2.1, first paragraph, second sentence: Both a former solvent dip tank and a solvent dip tank are referenced which implies that the latter is still in use. Please clarify.

Response: Only one solvent dip tank, which is no longer present, is associated with Washdown Area (WD) 041A. The sentence will be revised as follows: "Site 6 is relatively flat and is covered by Buildings 41, 273, and 501; asphalt, concrete, roads, and parking lots; former portable avionics laboratories; a former solvent dip tank; and fuel, sanitary sewer, and storm drain lines (see Figure 2-1)."

7. **Comment:** Page 2-1, Section 2.1, second paragraph, second sentence: The phrase "however, they are located outside of the site boundary" is not helpful to understanding Site 6 and is confusing to readers who have not followed the progression of defining the IR sites. Please remove the phrase.

Response: This comment is noted. The text will be revised as requested.

8. **Comment:** Page 2-4, Section 2.2.2, first and second sentence: Please revise. As written it appears that 26 IR sites were identified in 1988 under the Cal DHS RAO. It wasn't until 1999/2000 that the IR site number grew to 26, and more were added in subsequent years

Response: The first two sentences of Section 2.2.2 will be revised as follows: "In 1982, the Navy began investigations of contaminated sites under the auspices of the Navy Assessment and Control of Installation Pollutants (NACIP) Program. During an initial assessment study, 12 sites were evaluated as part of the NACIP Program. Additional study was recommended at seven of these sites, which included Sites 7 and 16 (Naval Energy and Environmental Support Activity [NEESA] 1983). In 1988, the Navy received a Remedial Action Order from the California Department of Health Services (now known as DTSC) that identified an additional 16 sites for evaluation (Tetra Tech 2004)."

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

9. **Comment:** Page 2-6, first paragraph, last sentence: What caused large changes in groundwater elevations at Site 6 and why would this increase the solvent concentrations? Did this phenomenon happen at all contaminated groundwater sites, and if not, why not?

Response: The last sentence of the first paragraph on page 2-6 will be deleted. This sentence provided an incomplete and irrelevant interpretation of a small subset of preliminary data; therefore, it is not considered relevant to the ROD.

10. **Comment:** Page 2-9, second paragraph, last sentence: Please elaborate on the status of TP-01 if DTSC does not officially close these types of sites.

Response: The Navy expects that Tiered Permit Facility (TP)-01 will be considered officially closed once DTSC concurs that all CERCLA work has been completed. By providing such concurrence, the Navy expects that DTSC will consider fulfilled the substantive requirements applicable for completion of corrective actions for this site under RCRA. The following text will be inserted as the last paragraph in Section 2.2.2.2: "RCRA Unit TP-01, a silver recovery unit, was located in the south-central portion of Building 41. The unit consisted of two 2 gallon containers holding spent x-ray fixer that contained silver. Based on the EBS report (Tetra Tech 2001c), DTSC was notified that this unit was closed, and a request for termination of the conditionally exempt specified waste streams tiered permit for five silver recovery units was submitted on May 11, 1998 (IT Corp. 2001a). Electronic correspondence from Marcia Liao of DTSC to Beth Kelly of Tetra Tech on May 23, 2002 indicated the conditionally exempt units were closed (Tetra Tech 2003b)."

11. **Comment:** Page 2-10, first through fifth paragraphs: Please note that in the letter describing the data gaps that needed addressing in the FS, ROD and RD/RA, EPA also requested, under CERCLA, further investigation of all soil and groundwater beneath OWSs at Sites 6, 7, 8 and 16 and WD areas at Site 6. The investigations are therefore not only to fulfill RCRA closure requirements, but also to satisfy CERCLA investigation requirements from the regulatory agencies.

Response: The Navy agrees with the statement above with the exception of substituting "RCRA corrective action" for "RCRA closure"; therefore, the text in Section 2.2.2 will be revised as follows: "When CERCLA investigation requirements from the regulatory agencies are met, the RCRA requirements for the SWMUs will also be fulfilled."

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

12. **Comment:** Page 2-14, Section 2.4, second paragraph: At the top of page 2-10, it states that the letter of December 29, 2005 recommended further action for NAS GAP 25 which contradicts the last sentence of this paragraph. Also, as stated in the above comment, the purpose of investigating the soil and groundwater beneath OWSs and WDs is to comply with the CERCLA requirements from the regulatory agencies. The RCRA closure requirements should concurrently be met through the CERCLA remedial actions.

Response: The paragraph will be revised to indicate that DTSC concurred with no further corrective action status for Naval Air Station (NAS) generator accumulation point (GAP) 25. Additionally, Dot Lofstrom of the DTSC has confirmed "corrective action complete" for NAS GAP 25 in a telephone conference with Steven Peck of the Navy on April 4, 2007 (Steven Peck and Dot Lofstrom 2007). The second paragraph in Section 2.4 will be revised as follows: "Based on evaluations conducted by the Navy using requirements stipulated in the final hazardous waste facility permit for Alameda Point, the Navy has recommended no further corrective action for NAS GAP 25 (SulTech 2004). During a telephone conference on April 4, 2007, the DTSC concurred with the no further corrective action status determination for NAS GAP 25 (Steven Peck and Dot Lofstrom 2007)."

Regarding the CERCLA requirements for oil-water separators (OWS) and WDs, the following sentence will be added to the second paragraph of Section 2.4: "The selected soil remedy within this ROD is intended to address the additional actions necessary to fulfill CERCLA requirements and obtain "corrective action complete" status for OWSs 040A, 040B, and 041, and WDs 040 and 041A. As a result, the RCRA requirements will be satisfied."

13. **Comment:** Page 2-17, second paragraph, third sentence: Please rephrase this sentence to more fully explain and support why PAHs are not a concern, i.e. that they occurred sporadically at low concentrations and at depth. As written it appears that the risk assessment was possibly faulty.

Response: Section 2.5.3.1 will be revised to clarify that polycyclic aromatic hydrocarbon (PAH) semivolatile organic compounds (SVOC) are not COCs because concentrations exceeding EPA preliminary remediation goals (PRG) do not exceed the site average threshold level of 0.62 milligram per kilogram (mg/kg) for benzo(a)pyrene [B(a)P]-equivalent chemicals; therefore, the remedial investigation (RI) determined that no CERCLA action is necessary for PAH SVOCs.

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

Paragraph 4 will be revised as follows: "Several non-PAH SVOCs were sporadically detected at Site 6 at concentrations below their respective PRGs. Three PAH SVOCs were detected at concentrations above EPA 2002 residential PRGs (EPA 2002a) (see Table 2-6); however, PAHs are not COCs at Site 6 and PAH concentrations are below the site average threshold level of 0.62 mg/kg for B(a)P-equivalent chemicals. One sample collected from beneath the paved parking lot contained B(a)P at concentrations exceeding the site average threshold level of 0.62 mg/kg, and the B(a)P is therefore likely attributable to the presence of asphalt. Consequently, the RI Report recommends no action for PAHs at Site 6."

14. **Comment:** Page 2-17, third paragraph: Please delete the part of the sentence "although located outside the Site 6 boundary". It does not add to the understanding of the ROD, but rather appears to confuse the issue of what is being addressed.

Response: The sentence will be revised as requested.

15. **Comment:** Page 2-19, last two paragraphs: We do not see what this information has to do with groundwater clean up at Site 6. Please make it clear that Site 6 falls to the east of Saratoga and thus currently meets the RB's criteria for protection as a drinking water source.

Response: The last two paragraphs on Page 2-19 will be deleted to avoid confusion.

16. **Comment:** Page 2-26, Section 2.9.1.2, first paragraph: Please include groundwater sampling with the soil sampling beneath the OWSs and WD areas, as requested by the regulators and agreed to by the Navy in the draft final RI, the FS and the PP.

Response: The text will be revised as follows: "Alternative 2 involves collection and analysis of additional soil and groundwater samples to evaluate the nature and extent of potential contamination beneath and adjacent to OWSs 040A and 040B."

17. **Comment:** Page 2-26, second paragraph, second sentence: How would RAOs be achieved for soil through ICs?

Response: As stated in EPA General Comment 1, the RAO for soil presented in Section 2.8.1 will be revised as follows: "Minimize the potential risk of exposure (through ingestion or dermal contact) of a commercial worker to unacceptable levels of COCs in Site 6 soil and either prevent exposure

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

(through ingestion or dermal contact) of future residents to unacceptable levels of COCs in Site 6 soil or prohibit residential use of the property.”

ICs are intended to minimize the potential for contact with soil that might contain COCs at concentrations posing risk; therefore, the RAO is achieved. The second sentence (now the third sentence) in the second paragraph in Section 2.9.1.2 will be revised as follows: “The ICs would remain in place to ensure that the RAO is achieved.” This should remove the implication that the ICs are an active component of the remediation process.

18. Comment: **Page 2-27, Section 2.9.2: Please see General Comment on RAOs.**

Response: The Navy assumes this comment refers to the same issue as EPA General Comment 1; therefore, please refer to the response to that comment.

19. Comment: **Page 2-28, Section 2.9.2.3: EPA considers MCLs to be ARARs, so Alternative 3 would need to clean groundwater up to MCLs.**

Response: This comment is noted. The alternative is intended to achieve maximum contaminant levels (MCL). The difference between Alternatives 3 and 4 is the length of time for active remediation. Alternative 3 will use monitored natural attenuation (MNA) to achieve final cleanup of groundwater contamination. The fourth sentence will be modified as follows to identify MCLs as the remediation goals: “MNA would then be implemented until the remediation goals (based on MCLs) are achieved.”

20. Comment: **Page 2-29, Section 2.10.1: This section should be a comparative analysis of remedial alternatives for soil. However, Section 2.10.1.1. second sentence references ICs on groundwater use, rather than ICs on soil exposure, and the following sentence in this section discusses Alternative 3 for groundwater remediation. Please rewrite.**

Response: This comment is noted. The section will be revised to read as follows: “Alternative 2 (Sampling and ICs) would reduce risks at Site 6 to acceptable levels by evaluating the nature and extent of potential soil contamination beneath and adjacent to OWSs 040A and 040B, and by implementing ICs to prohibit excavation of soil without prior regulatory approval. Such prohibition would prevent any significant inhalation or ingestion of or dermal contact with contaminated soil. Alternative 3 (Sampling and Excavation with Off-Site Disposal of Soil) would reduce risks at Site 6 to acceptable levels such that there would be no restrictions on site use by evaluating the nature and extent of potential soil

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

contamination beneath and adjacent to OWSs 040A and 040B, followed by excavation and off-site disposal of soil that exceeds remediation goals.”

21. **Comment:** Page 2-29, Section 2.10.1.2, second sentence: How do Alternative 2 and 3 for soil cleanup meet ARARs for groundwater?

Response: This comment is noted. The text will be revised to remove the reference to groundwater applicable or relevant and appropriate requirements (ARAR). The text will be revised as follows: “Alternatives 2 and 3 meet or have the potential to meet ARARs for soil at Site 6 based on the respective reuse scenarios for each alternative.”

22. **Comment:** Page 2-31, section 2.10.2.1, second paragraph, last sentence: Add at the end of the sentence “until remedial goals are met.” The ICs will only be in place for the duration of the clean up.

Response: This comment is noted. The phrase “until remediation goals are met” will be added.

23. **Comment:** Table 2-3: There are 12 SWMUs referenced on page 2-9, but Table 2-3 only lists six. Where are the remaining six? Please clarify, both in the text on page 2-9 and in this table. Also, please note that the final determination in the ROD for OWSs and WD areas should be additionally to address the CERCLA requirements stated by the regulators per the RI and FS reviews.

Response: The text will be revised to clarify that the 11 SWMUs at OU-1 Sites 6, 7, 8, and 16 were recommended for integration into the CERCLA program. The second to the last sentence in the fifth paragraph of Section 2.2.2.2 will be revised as follows: “Eleven SWMUs within OU-1 Sites 6, 7, 8, and 16 were recommended for integration with the CERCLA program and are addressed in this ROD.” In addition, the sixth paragraph and associated bullets in Section 2.2.2.2 will now read as follows to the Site 6 SWMUs:

“The RCRA investigation activities conducted at Site 6 are described below. Table 2-2 summarizes the RCRA investigation activities at Site 6. Table 2-3 summarizes the status of each SWMU located within Site 6.

The following six SWMUs were identified within Site 6 (DTSC 1992):

- NAS GAP 25

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

- OWSs 040A, 040B, and 041
- WDs 040 and 041A”

Regarding the CERCLA requirements, the following sentence will be added to the “Final Determination in the ROD” column of Table 2-3: “The selected soil remedy within this ROD is intended to address the additional actions necessary to fulfill CERCLA requirements and obtain “corrective action complete” status for this SWMU.” For consistency, this revision also will be made to the “Final Determination in this ROD” column of Tables 3-3, 4-3, and 5-3.

24. Comment: **Table 2-7: It is helpful to have the column listing the MCLs for reference, but we question the value of the “background” column since only antimony and lead appear to exceed background. If the Navy thinks that the background column is necessary, please revise the heading to make it clear what the column means. It seems that the use of “yes” and “no” here is opposite to the “yes” and “no” used for the “background” column in the Site 26 ROD.**

Response: The “Background” heading in Table 2-7 will be revised to “Above Background,” and the accompanying note will be revised as follows: “Yes indicates site concentrations exceeded background concentrations for Alameda Point. This comparison was made for inorganic chemicals only, primarily metals.” Tables 2-6, 3-5, 3-6, 4-5, 4-6, 5-5, and 5-6 will also be revised for consistency.

25. Comment: **Page 3-4, last paragraph, first sentence: Add “In October 2002, during excavation of surface soil in preparation for removal of lead contaminated soil, a blue, crystalline...”**

Response: This comment is noted. The text will be revised as requested.

26. Comment: **Page 3-5, first full sentence: Please clarify this sentence further. As it currently reads, and following the previous sentence, the implication is the debris layer was delineated and removed, but this has not yet been done.**

Response: The TPH- and lead-contaminated soil removal action was inadvertently discussed in Section 3.2.2.1, CERCLA Investigation Activities; therefore, the TPH- and lead-contaminated soil removal action will be deleted from this section.

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

The TPH- and lead-contaminated soil removal action is also discussed in Section 3.2.2.4, TPH Investigation Activities; therefore, the clarification requested will be made in Section 3.2.2.4. The last sentence will be revised as follows: "Prior to halting excavation activities, about 1,320 cubic feet of soil was removed and disposed of off site (Shaw 2003b)."

27. Comment: Page 3-6, second full paragraph, last sentence: Please clarify this sentence as the reasoning does not follow with the current wording.

Response: This last sentence in the "Site 7 Supplemental Investigation" section of 3.2.2.1 will be revised as follows: "The RI Report indicates that the metallic debris layer is believed to be incinerator or building demolition debris. Because dioxins were detected at such low concentrations in soil during this investigation, it can be deduced that the debris layer consists of building demolition debris as opposed to incinerator debris (Tetra Tech 2003d)."

28. Comment: Page 3-7, last paragraph and last sentence: Please correct this paragraph to reflect the regulators position with respect to OWS 459 at Site 7. In our review of the RI, EPA specified that the investigation of soil and groundwater beneath the OWS at Site 7 had not been adequate and required further investigation during the RD/RA phase, to which the Navy agreed.

Response: The text will be revised as follows: "However, EPA and DTSC subsequently requested and the Navy agreed to perform further sampling during the remedial design phase to evaluate the nature and extent of potential soil and groundwater contamination beneath and adjacent to OWS 459 at Site 7 (Tetra Tech 2004; DTSC 2005). As a result, the RCRA requirements will be satisfied."

29. Comment: Page 3-10, Middle paragraph related to debris area: Please clarify this paragraph in accordance with the previous comments made for pages 3-4 and 3-5.

Response: The referenced sentence on Page 3-10 will be revised as follows: "Prior to halting excavation activities, about 1,320 cubic feet of soil was removed and disposed of off site (Shaw 2003b)."

30. Comment: Page 3-10, Section 3.3, first sentence: Please complete this sentence. The sites have undergone the same community participation activities as what?

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

- Response:** Section 3.3, first sentence, will be revised as follows: "The community activities performed at Site 7 are described in Section 2.3."
31. **Comment:** Page 3-11, Section 3.4, second sentence: Please include investigation of groundwater beneath OWS 459 as well.
- Response:** Section 3.4, second sentence, will be revised as follows: "For Site 7, the scope of this ROD includes the additional investigation of soil and groundwater beneath and adjacent to OWS 459 to evaluate the nature and extent of potential soil and groundwater contamination."
32. **Comment:** Page 3-11, Section 3.4, second paragraph: Please correct this paragraph to reflect the regulators position with respect to OWS 459 at Site 7. In our review of the RI, EPA specified that the investigation of soil and groundwater beneath the OWS at Site 7 had not been adequate and required further investigation during the RD/RA phase, to which the Navy agreed. The additional investigation is being performed under CERCLA and is also designed to fulfill any RCRA requirements.
- Response:** This comment is noted. The second paragraph of Section 3.4 will be revised as requested. The following text will replace the last sentence of the second paragraph: "EPA and DTSC requested and the Navy agreed to perform further sampling during the remedial design phase to evaluate the nature and extent of potential soil and groundwater contamination beneath and adjacent to OWS 459 at Site 7 (Tetra Tech 2004; DTSC 2005)."
- A third paragraph will also be added to this section and will state the following: "The selected soil remedy within this ROD is intended to address the additional actions necessary to fulfill CERCLA requirements and obtain "corrective action complete" status for OWS 459. As a result, the RCRA requirements will be satisfied."
33. **Comment:** Page 3-12, Section 3.5.3.1, Debris Area Soil, second sentence: This sentence can be read that all chemicals were frequently detected at concentrations above PRGs. Please reword and clarify.
- Response:** This comment is noted. The second sentence will be deleted because it is inaccurate. The third sentence provides a more accurate description of the analytical results.
34. **Comment:** Page 3-12, Section 3.5.3.1, Debris Area, third paragraph: Please note that other IR sites on base have had PAH contamination with

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

sporadic patterns that did not indicate a release, yet have required remediation. Please reword this paragraph to provide better support and justification for the conclusion that PAHs are not a problem at Site 7 (the PP has better language regarding this issue).

Response: This comment is noted. The third paragraph in Section 3.5.3.1 will be revised as follows:

"Several non-PAH SVOCs were sporadically detected in the debris area soil at Site 7 at concentrations below their respective PRGs. Six PAH SVOCs were detected at concentrations above EPA 2002 residential PRGs (EPA 2002a) (see Table 3-5). However, PAHs are not COCs at Site 7, and PAH concentrations are below the site average threshold level of 0.62 mg/kg for B(a)P-equivalent chemicals. The horizontal and vertical spatial pattern of detections of PAH SVOCs was not indicative of a release at Site 7. The source of PAHs outside of the debris area is attributable to the subsurface soil layer known as the "Marsh Crust" and to dredged materials from San Francisco Bay used to construct Alameda Point. PAHs are not designated as COCs in the RI Report. Petroleum contamination at Site 7 is being addressed under the Alameda Point TPH program."

35. Comment: Page 3-13, second paragraph: A discussion of cadmium is missing from this paragraph. Please include information on this contaminant with the arsenic and iron.

Response: The following sentence will be added to Section 3.5.3.1: "Antimony and cadmium concentrations in the nondebris area soil at Site 7 are attributable to Alameda Point background concentrations (see Table 3-5)."

36. Comment: Page 3-14, second paragraph, last sentence: This statement begs the question, "What are the concentrations of TCE now?" Please address.

Response: The sentence will be revised to include trichloroethene (TCE) detection data as follows: "The only detection of TCE occurred in 1995 in one soil sample collected near UST(R)-15/NAS GAP 16."

37. Comment: Page 3-15, Section 3.7.1, first paragraph, last sentence: This sentence does not follow or make sense. Suggest deleting.

Response: This comment is noted. The sentence will be deleted as suggested.

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

38. Comment: Page 3-16, Section 3.7.1.1, second paragraph, second and third sentence: This explanation is not helpful. It appears that all soil COPCs are not attributable to background, yet there is no further discussion of which COPCs are a problem. Also, as EPA has stated previously, arsenic levels in groundwater are not similar to background: they are an order of magnitude greater. The Navy has indirectly acknowledged this by stating that the high levels of arsenic are due to the TPH in the groundwater and that arsenic levels will decrease as TPH contamination is remediated. Please clarify which COPCs are a problem in the soil, and please delete the reference to arsenic levels being similar to background.

Response: The text in Section 3.7.1.1 will be revised because it did not adequately discuss the chemicals of potential concern (COPC) selection process used in the baseline human health risk assessment (BHHRA). The second paragraph will be modified to read as follows: "The BHHRA quantitatively evaluated all detected chemicals identified as COPCs for soil and groundwater. The soil debris area was evaluated separately from the remainder of Site 7. Thus, two sets of COPCs were identified for soil based on the results of investigations conducted within Site 7. For example, lead was identified as a COPC within the debris area soil but not within the nondebris area soil (Tetra Tech 2004). The background comparison was not a consideration in selecting COPCs; therefore, all metals in soil or groundwater were retained as COPCs regardless of their background concentrations. All Site 7 COPCs are presented in the OU-1 Sites 6, 7, 8, and 16 RI Report (Tetra Tech 2004)."

39. Comment: Page 3-19, Section 3.8.1, first and second bullet: Replace the word "minimize" with the word "prevent".

Response: Consistent with the RAO language negotiated and discussed in General Comment 1, the Navy has decided to leave the word "minimize" in the RAO for Site 7. This makes the RAO consistent with RAOs for Sites 6, 8, and 16.

40. Comment: Page 3-21, Section 3.10.1, third sentence: Add to the end of the sentence "or in the debris area."

Response: This comment is noted. The text will be revised as requested.

41. Comment: Table 3-3, page 1 of 1: Please note that the final determination in the ROD for OWS 459 should be additionally to address the CERCLA requirements stated by the regulators per the RI and FS reviews.

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

Response: Please see the second paragraph of the response to EPA Specific Comment 23.

- 42. Comment:** **Table 3-5: If the Navy thinks that the background column is necessary in this table, please revise the heading to make it clear what the column means. It seems that the use of “yes” and “no” here is opposite to the “yes” and “no” used for the “background” column in the Site 26 ROD. Additionally, it is confusing why no comparison to background was made for the debris soil area, especially since page 3-12 states that copper contamination was not due to Navy activities and iron exceeded background concentrations. What are these statements based on if not a comparison to background values?**

Response: Please see the response to EPA Specific Comment 24 regarding the background column.

No comparison to background was made for the debris soil area because a removal action was planned for this area; therefore, the paragraph will be revised to read as follows: “Nine metals were detected at concentrations above the residential PRGs (see Table 3-5). A background comparison was not conducted for the debris area soil (Tetra Tech 2004). The maximum concentration of arsenic in the debris area soil detected was observed at location S07-SSI-SS11. Cadmium and lead concentrations may be associated with activities around the incinerator (former Building 68). The maximum concentration of copper was detected in soil in the south central portion of Site 7. However, copper is a naturally occurring component in soil and no former activities performed at Site 7 would have resulted in a release of copper.

- 43. Comment:** **Table 3-6: Again, the “Site > Background” yes or no is confusing here and seems to be the opposite of what was done for Site 26.**

Response: Please see the response to EPA Specific Comment 24.

- 44. Comment:** **Table 3-8: The cancer risk and non-cancer hazard index for residential groundwater jumps out here. Since no CERCLA action is being taken, a footnote explaining that ongoing remedial action under the TPH program is expected to reduce this risk to below the risk management range would be useful here.**

Response: The following note will be added to Table 3-8 to explain the origin of the risk and remedial action under the Alameda Point TPH program:

“c Risks for residential exposure to groundwater reported in the risk assessment are driven by an abnormally high variability in arsenic

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

concentrations in groundwater samples collected from 1994 to 1998. The high concentrations were attributed to changes in geochemistry caused by the release of petroleum products from underground storage tanks. Data from recent (2002 to 2006) groundwater monitoring samples show that in wells that previously exhibited arsenic concentrations of 100 to 398 micrograms per liter, concentrations have decreased to less than 10 micrograms per liter (the maximum contaminant level for arsenic).”

45. Comment: **Table 4-3: Please note that the final determination in the ROD for the OWS and WD area should be additionally to address the CERCLA requirements stated by the regulators per the RI and FS reviews.**

Response: Please see the second paragraph of the response to EPA Specific Comment 23.

46. Comment: **Tables 4-5 and 4-6: Same comment as that regarding background column for Table 3-6.**

Response: Please see the response to EPA Specific Comment 24.

47. Comment: **Table 5-3: Please note that the final determination in the ROD for the OWSs and WD area should be additionally to address the CERCLA requirements stated by the regulators per the RI and FS reviews.**

Response: Please see the second paragraph of the response to EPA Specific Comment 23.

48. Comment: **Tables 5-5 and 5-6: Same comment as that regarding background column for Table 3-6.**

Response: Please see the response to EPA Specific Comment 24.

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

Specific Comments on the Responsiveness Summary

1. **Comment:** Patrick Lynch Comment #4: It would also be useful and reassuring to include information about the base boundary groundwater monitoring wells, located on the eastern side of Site 16, that act as guard wells. These wells are subject to quarterly or semi-annual monitoring and have not shown any contaminants that exceed the MCLs. Additionally, the groundwater gradient moves away from Encinal High School toward the Bay, further reassurance that the students and the young children in the day care center are protected from any contaminated groundwater at Site 16.

Response: This comment is noted. The suggested additions will be checked against the latest groundwater datasets and made as required. The following additional text will be added to the response: "The Navy would like to point out that a successful removal action has been completed at Site 16 for chlorinated volatile organic compounds. Although additional work still remains, the groundwater monitoring program shows that groundwater flows west and southwest away from Encinal High School."

2. **Comment:** Patrick Lynch Comment #7: The response does not address the request in the comment. Please describe the disposal methods employed for soil excavated during utility construction at Site 16.

Response: There were no excavations conducted for utility construction for a residence. A PCB removal action was conducted in 1997 that is described in Section 5.2.2.1 of the ROD.

Specific Comments Regarding Minor Edits

1. **Comment:** Page 2-9, second paragraph, end of first sentence: There needs to be spacing between the end of this sentence and the beginning of the next sentence.

Response: This comment is noted. The text will be revised as requested.

2. **Comment:** Page 2-10, last paragraph, second and third sentence: A period and spacing are missing between these two sentences.

Response: This comment is noted. The text will be revised as requested.

RESPONSES TO COMMENTS FROM EPA (CONTINUED)

3. Comment: Page 2-11, Section 2.2.2.4, second sentence: The word "Sites" is misspelled toward the end of this sentence.

Response: This comment is noted. The text will be revised as requested.

4. Comment: Page 2-31, last paragraph, first sentence: "because" is misspelled.

Response: This comment is noted. The text will be revised as requested.

5. Comment: Page 3-11, Section 3.4, third sentence: Change "would" to "will"

Response: This comment is noted. The text will be revised as requested.

6. Comment: Page 3-13, Section 3.5.3.2, third sentence: TPR should be TPH.

Response: This comment is noted. The text will be revised as requested.

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL

1. **Comment:** **pD-6. Data Certification Checklist. Second item, "Potential Land Use," states that the selected remedies will allow for commercial/industrial use of Sites 6 and 16. We assume this statement is in error, as it conflicts with the fourth item, "key factors," and the RGs are set at residential levels. If these sites are not being remediated to unrestricted use, there will need to be ICs.**

Response: The text description in checklist item "Potential land and groundwater use that will be available at the sites as a result of the selected remedies for soil and groundwater" will be revised. The final sentence will be replaced as follows: "For IR Sites 6 and 16, the remediation goals, once achieved, will not only allow for commercial/industrial use, but also potentially achieve unrestricted use."

2. **Comment:** **Sec. 2.5.3.1, Soil, p. 2-17. As written, it is not apparent why soil remediation is needed. We recommend adding an explanation of why a remedial action for soil is being selected. Same concern on p. 2-23.**

Response: The second to last paragraph of Section 2.5.3.1 will read as follows: "Although the RI Report concluded that soil at Site 6 does not require remediation, EPA and DTSC subsequently requested and the Navy agreed to perform further sampling during the remedial design phase to evaluate the nature and extent of potential soil and groundwater contamination beneath and adjacent to OWSs 040A and 040B at Site 6 (Tetra Tech 2004; DTSC 2005). At the time of preparation of this ROD, the Navy is working collaboratively with the agencies on the work plan associated with this sampling event."

3. **Comment:** **Sec. 2.5.3.2, Groundwater, p. 2-17. The discussion of metals suggests that antimony, lead and thallium exceed MCLs and are not attributable to background. There needs to be an explanation of why these metals are not being addressed.**

Response: The end of the first paragraph of Section 2.5.3 (and Sections 3.5.3, 4.5.3, and 5.5.3) will be modified with the addition of the following sentences: "The following discussion of nature and extent compares detected concentrations of chemicals to the 2002 residential PRG, tap water PRG, and MCL values. Each chemical with one or more exceedances of the PRG or MCL is discussed in later sections of this ROD but is not necessarily selected as a chemical of concern (COC) at Site 6."

In Section 2.5.3.2, the following text will be added to the second paragraph to provide recent groundwater results from the Spring 2006 Alameda Basewide Annual Groundwater Monitoring Report (Innovative

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

Technical Solutions, Inc. [ITSI] 2006) and to indicate why antimony, lead, and thallium were not listed as COCs. "Thallium exceeded the MCL in only one sample collected from a direct-push boring located in the SWBZ. The SWBZ is not considered a potential drinking water source; therefore, thallium was not evaluated in the risk assessment. Antimony, lead, manganese, and thallium have not been detected at concentrations above the MCLs in samples collected between 2002 and 2006 (ITSI 2006). Arsenic was detected above the MCL in only 2 of 24 samples collected between 2002 and 2006, most recently in the summer of 2004."

The following sentence will be added to the end of the third paragraph of Section 2.7.1.3 under the "Site 6 Groundwater" heading:

"Antimony was determined not to pose a cancer risk greater than 1×10^{-6} or non-cancer HI greater than 1."

4. **Comment:** **Sec. 2.7.1.3, Risk Characterization p. 2-24, Groundwater. The first paragraph on the page is very unclear.**

Response: The text for this paragraph will be rewritten to read as follows: "The risk from potential exposure to COPCs in groundwater was evaluated for the commercial/industrial and residential exposure scenarios. For the commercial/industrial exposure scenario, only the inhalation of vapors from VOCs that migrate from groundwater to indoor air was evaluated. The cancer risk for commercial/industrial receptors from exposure to groundwater was 6×10^{-5} , which is within the risk management range (see Table 2-9). The noncancer HI was 0.05, which is below 1 (Tetra Tech 2004). Potential exposure of either the recreational or construction worker receptors was considered incomplete; therefore, risk was not calculated."

5. **Comment:** **p. 2-24, second paragraph: The document previously indicated that lead exceeds MCLs. Therefore, why is it not being addressed? What is the basis for the first sentence in this paragraph?**

Response: The referenced paragraph will be revised to read as follows: "Potential site risk to human health from ingestion of lead in Site 6 groundwater was considered to be minimal because the EPC for lead in groundwater is 0.22 $\mu\text{g/L}$. This is an order of magnitude lower than the action level for lead in drinking water of 15 $\mu\text{g/L}$; therefore, the potential hazard from exposure to lead in groundwater was not evaluated using LeadSpread."

6. **Comment:** **Sec. 2.8. RAOs, p. 2-25. The Navy has agreed to change the soil RAO as follows: "Minimize the potential risk of exposure (through**

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

ingestion or dermal contact) of a commercial worker to COCs in soil and either prevent exposure (through ingestion or dermal contact) of future residents to COCs in soil or prohibit residential use of the property."

Response: This comment is noted. The text will be revised as presented in response to EPA General Comment 1.

- 7. Comment:** **Sec. 2.9.1.2, p. 2-26, Soil Alt. 2, ICs. If the COCs remain at levels higher than residential PRGs or background, then this alternative should also include ICs prohibiting residential use of the property. [Same issue for Site 16, Sec. 5.9.1.2, p. 5-19.]**

Response: This comment is noted. The IC component of the alternative will be revised to include residential use restrictions if COCs remain at levels higher than the remediation goals. Please note, however, that the ICs developed for Alternative 2 do not involve the prohibition of all potential future residential use; rather, they focus only on residential excavation activities because the risk assessment results indicate that exposure to surface soils is not expected to pose significant risk to future residents. Conforming changes will be made in the relevant sections for Site 16.

- 8. Comment:** **Sec. 2.9.1.3, Soil Alt. 3, p. 2-27. Add at end of paragraph, "and site will be suitable for unrestricted use."**

Response: This comment is noted. The text will be revised as requested.

- 9. Comment:** **Sec. 2.10.1.4, p. 2-30. Prohibiting excavation does not constitute reduction of mobility through treatment.**

Response: This comment is noted. The text will be revised to remove the assertion that excavation constitutes reduction of mobility through treatment.

- 10. Comment:** **Sec. 2.10.2.1, p. 2-31, second par. HH under alts. 3 and 4 would also be protected because the groundwater would be cleaned up.**

Response: This comment is noted. Text discussing Alternatives 3 and 4 will be revised as requested.

- 11. Comment:** **Sec. 2.12.2.1, p. 2-37, first par., next to last line, please add "or resident" after "commercial/industrial worker."**

Response: This comment is noted. The text will be revised as requested.

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

Comments on Section 3.0, Site 7

12. Comment: Sec. 3.5.3.2, p. 3-13. In first paragraph, should "TPR" be "TPH"?

Response: The correction from "TPR" to "TPH" will be made.

13. Comment: In various places where the documents states that the groundwater does not pose a significant risk from CERCLA chemicals, we recommend that the Navy include the statement that groundwater contamination is being addressed through the TPH program. For example, sec. 3.8.1 (p. 3-20), sec. 3.12 (p. 3-23), and Table 3-8.

Response: This comment is noted. The text in Sections 3.8.2 and 3.12 will revised as follows: "Groundwater contamination associated with the release of petroleum products from USTs at Site 7 is being addressed under the Alameda Point TPH program." The following note will be added to Table 3-8:

b Risks presented for groundwater are only for Comprehensive Environmental Response, Compensation, and Liability Act contaminants and do not include risks from petroleum contamination. Groundwater contamination associated with the release of petroleum products from underground storage tanks at Site 7 is being addressed under the Navy's Total Petroleum Hydrocarbons program.

14. Comment: Sec. 3.12, p. 3-23. We recommend adding "from CERCLA chemicals" to the end of the sentence beginning "The Navy has determined...." Similarly, in the last line of that paragraph, we recommend adding "CERCLA" before "releases".

Response: This comment is noted. The text will be revised as requested.

Comments on Section 4.0, Site 8

15. Comment: Groundwater. In the PP, the Navy committed to further sampling of the groundwater, especially of benzene and TCE. That commitment should also be memorialized in the ROD, with a commitment that if it is determined that groundwater remedial action will be needed, there will be an ESD or ROD amendment. [I think a good place for this commitment would be Sec. 4.8.2 on page 4-17.] Especially regarding benzene, the ROD indicates that concentrations are above MCLs and are not declining (sec. 4.5.3.2, p. 4-12). Subsequently, groundwater is

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

analyzed in terms of risk, but there is no discussion of MCLs. There needs to be more clarity as to why no action is being taken for benzene. [Or is it being addressed under TPH? That's sort of implied in 6.1 at the top of p. 6-2, and also in 6.6 on p. 6-15.]

Response: The last two sentences of Section 4.5.3.2 will be replaced by the following text: "TPH-associated components (lead, benzene, and MTBE) in groundwater were detected in groundwater at Site 8. The highest of these detections occurred near the northeastern and northwestern sides of Building 114, within and around WD 114, and near sanitary sewer lines in the southern portion of Site 8 (Tetra Tech 2004). Analytical results from 2002 through 2006 for the basewide groundwater monitoring program (Shaw 2003a and 2003c; ITSI 2006) show that benzene was sporadically detected at concentrations both above and below the MCL and that TCE was consistently detected at concentrations below the MCL. Benzene contamination will be evaluated under the Alameda Point TPH program."

The following text will be added to the second paragraph in Section 4.7.1.4: "The combined risk from benzene and TCE is 4×10^{-5} , which is within the risk management range of 10^{-4} to 10^{-6} . Analytical results from 2002 through 2006 for the basewide groundwater monitoring program (Shaw 2003a and 2003c; ITSI 2006) show that benzene was sporadically detected at concentrations both above and the below MCL and that TCE was consistently detected at concentrations below the MCL. Therefore, it is likely that the combined risk from benzene and TCE is overestimated. Because risk from arsenic is attributed to background and risk from benzene and TCE is likely overestimated, no CERCLA action is recommended for groundwater at Site 8. Benzene contamination will be evaluated under the Alameda Point TPH program. The Navy has agreed to perform further sampling during the remedial design phase to evaluate the nature the extent of potential soil and groundwater contamination beneath and adjacent to OWS 114 at Site 8 (Tetra Tech 2004; DTSC 2005)."

16. Comment: **Sec. 4.10.2, p. 4-19. Why the reference to ARARs for groundwater when the only action is for soil? (Similar concern in Sec. 3.)**

Response: This comment is noted. The text will be revised to remove the reference to groundwater ARARs.

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

Comments on Section 5.0, Site 16

17. **Comment:** COCs – It is not clear how the COCs were selected.

Soil: Sec. 5.7.1.3 on p. 5-16 mentions PCB-contaminated soil as well as the OWS, but elsewhere in the chapter there is only mention of the OWSs. [6.2.1.1 on p. 6-3 also mentions the possibility of PCBs at Site 16.]

Groundwater: Lead is mentioned in Sec. 5.5.3.2 (p. 5-12) as exceeding both background and PRGs, but it is not mentioned later in 5.7.1.4 (p. 5-16) or 5.7.3 (p. 5-17). Why is it not a COC? Also, Sec. 5.7.1.4 attributes some of the groundwater risk to pesticides and aluminum, but they are not mentioned as COCs in 5.7.3 (p. 5-17).

Response: This comment is noted. Section 5.0 will be revised to clarify the COC selection process as follows:

Soil and Groundwater: The first three paragraphs of Section 5.7.3 will be replaced by the following three paragraphs: “Chemicals at Site 16 were identified as COCs based primarily on the results of the risk assessment process, but the potential exposure concentrations for several chemicals were assessed further because of the transient nature their concentrations in groundwater. No COCs were identified for soil under any of the Site 16 risk scenarios (Tetra Tech 2004). Insufficient information is known about potential contamination beneath and adjacent to OWSs 608A and 608B. Consequently, additional sampling beneath and adjacent to these OWSs will be conducted to determine the extent of any contamination and identify any soil COCs associated with these OWSs.

COCs identified for groundwater for the residential scenario are 1,4-DCB; 1,3-DCB; TCE; PCE; and vinyl chloride (Tetra Tech 2004). These chemicals pose risk from vapor intrusion to indoor air and through domestic use of groundwater. Lead in groundwater, heptachlor epoxide, and chlordane were identified as potential risk drivers in the BHHRA. However, it was determined that the EPCs for these contaminants were biased by highly variable monitoring data (for lead) or the EPCs were less than or equal to the MCLs (for heptachlor epoxide and chlordane), and monitoring data showed that the contaminants were only detected sporadically.

The highest residential (child) RME HI (including background) is 14, which exceeds 1 (see Table 5-8). Groundwater noncancer risks are attributed primarily to 1,3-DCB; aluminum; arsenic; cadmium; manganese; and TCE. Aluminum, arsenic, cadmium, and manganese are

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

attributed to background and therefore were not retained as COCs (Tetra Tech 2004).”

Groundwater: The last sentence of paragraph 2 of Section 5.5.3.2 will be replaced with the following text: “Lead exceeded the MCL in only one sample evaluated during the RI. This sample was determined to be a consequence of the 2004 ISCO removal action conducted at Site 16, and the lead result was therefore considered anomalous. Since the anomalous detection, only two samples contained lead at concentrations exceeding the MCL. These two samples were collected from the same well after the ISCO removal action. Based on samples collected between 2005 and 2006 under the basewide groundwater monitoring program, lead was not detected at concentrations exceeding the MCL (ITSI 2006). Therefore, lead is not a COC for groundwater at Site 16.”

Groundwater: The following text will be added to Section 5.5.3.2: “Pesticides (alpha-chlordane and heptachlor epoxide) and lead were detected in groundwater near the former location of UST 608-1/NAS GAP 17. The alpha-chlordane concentration exceeded the risk-based screening level of 0.19 µg/L in only one of three samples with detected concentrations from Site 16. Heptachlor epoxide was detected in two samples at concentrations ranging from 0.01 to 0.013 µg/L, exceeding the risk-based screening concentration of 0.0074 µg/L.”

Groundwater: The following text will be added to Section 5.7.1.4: “Under the residential scenario for Site 16 groundwater, the total RME cancer risk (including background) is 7×10^{-4} , which exceeds the risk management range (EPA 1991). Groundwater risks are attributed primarily to 1,4-dichlorobenzene (DCB), alpha-chlordane, arsenic, heptachlor epoxide, PCE, TCE, and vinyl chloride. Alpha-chlordane was detected in only three samples, and the calculated EPC was less than the California MCL of 0.1 µg/L. Alpha-chlordane was not retained as a COC because the risk assessment determined that the risk from alpha-chlordane was within the risk management range (approximately 1×10^{-5}). Heptachlor epoxide was only detected sporadically, and the calculated EPC was equal to the California MCL. Heptachlor epoxide was evaluated in the risk assessment, and the risk was determined to be 1×10^{-6} .”

18. Comment: Sec. 5.8 , p . 5-17 and 5-18, RAOs. Same comments as with Site 6.

Response: Please see the response to EPA General Comment 1.

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

19. **Comment:** Sec. 5.10.2.1 (p. 5-23). Second paragraph mixes up the remedies and needs editing. It may be sufficient to change "Alternatives 2" in the first sentence to "Alternative 3" and then in the fifth line, after "Risk to human health" insert "under Alternative 2."

Response: The text will be revised to read as follows: "Alternative 2 (Plume Boundary Refinement, MNA, and ICs), Alternative 3 (Active Treatment to Reduce Risk to Commercial/Industrial Workers with ISCO and Accelerated Bioremediation MNA, and ICs), and Alternative 4 (Treatment to Remediation Goals with ISCO and Accelerated Bioremediation, MNA, and ICs) would protect human health by preventing exposure to contaminated groundwater and vapors partitioning from groundwater. Until remedial goals are achieved, risk to human health would be prevented by (1) prohibiting the installation of extraction wells at Site 16; (2) prohibiting the extraction of groundwater and installation of new groundwater wells until the remediation goals have been achieved; and (3) requiring future landowners to gain written approval from the FFA signatories prior to any residential, commercial/industrial, hospital, or daycare use of the site."

Comments on Section 6.0, Statutory Determinations

20. **Comment:** Sec. 6.0, p. 6-1, third line from bottom, after "hazardous waste" need to add "through treatment."

Response: This comment is noted. The text will be revised as requested.

21. **Comment:** Sec. 6.1, p. 6-1, last paragraph, items (1) and (2), change "prohibiting" to "prohibit."

Response: Please see response to DTSC Comment 1. The Navy will significantly revise Section 6.1 as described in the italicized portion of the Navy's response to DTSC Comment 1. ICs are specifically described in the last sentence of this italicized discussion.

22. **Comment:** CERCLA 121(e) does not exempt the Navy from any applicable permit requirements for off-site disposal.

Response: The Navy acknowledges that CERCLA § 121(e) applies only to specific components of remedial actions that are conducted entirely on site. The Navy will revise the third sentence of the first paragraph under Section 6.2 as follows: "CERCLA § 121(e) exempts remedial actions conducted entirely on site from obtaining federal, state, or local permits; therefore, the Navy will not obtain any permit for the excavation of soil or the

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

construction and operation of the ISCO and accelerated bioremediation treatment systems. The Navy will obtain all permits required for any portion of the remedial action conducted off site.”

23. **Comment:** **Sec. 6.2.1.2, page 6-5, discussion of Site 8. This paragraph should state why there is no remedial action for Site 8 GW. And/or include the commitment in the PP for further sampling. Page 6-15 (sec. 6.6) mentions that Site 8 groundwater is being addressed under the TPH program, although that is not set forth clearly in other parts of the document, and it doesn't address possible VOC contamination in Site 8.**

Response: Please see the response to EPA Regional Counsel Comment 15. Paragraph 5 of the “Safe Drinking Water Act and State MCLs” section of Section 6.2.1.2 will be replaced with the following text: “Groundwater in the FWBZ at Site 8 meets the definition of a Class II aquifer under the federal classification criteria and is designated with a potential municipal or domestic supply beneficial use. The Navy has determined that no CERCLA remedial action for Site 8 groundwater is necessary because analytical results from 2002 through 2006 for the basewide groundwater monitoring program (Shaw 2003a and 2003c; ITSI 2006) show that benzene was sporadically detected at concentrations both above and below the MCL and that TCE was consistently detected at concentrations below the MCL. Benzene contamination will be evaluated under the Alameda Point TPH program.”

24. **Comment:** **Sec. 6.2.2, p. 6-8. All the location-specific ARARs are discussed except for ESA. EPA recommends that this section also include a brief discussion of the ESA.**

Response: The only threatened or endangered species that has been identified at NAS Alameda is the California least tern. The Navy has determined that the Endangered Species Act of 1973 is not an ARAR for any of the sites that are a part of the OU-1 ROD because neither the California least tern nor its habitat (or foraging areas) are present on any of these sites. The Navy will delete all references to and discussions of the Endangered Species Act as an ARAR. Additionally, Section 6.2.2 will be revised as follows: “The only threatened or endangered species that has been identified at NAS Alameda is the California least tern. The substantive provisions of the Endangered Species Act of 1973 are not ARARs because neither the California least tern, a federally endangered species, nor its habitat are present on OU-1 Sites 6, 7, 8, and 16 (Navy and Tetra Tech 1997). Furthermore, none of the remedial actions selected in this ROD for any of the sites will affect the California least tern or its habitat.”

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

25. Comment: **Sec. 6.5, p. 6-14, Preference for Treatment. It is not correct to say that the soil remedies address the preference for treatment because they employ treatment. They don't.**

Response: This comment is noted. The text in Section 6.5 discussing preference for treatment of soils will be revised as follows: "The selected soil remedy does not satisfy the statutory preference for treatment as a principal element of the remedy. The soil remedy will not reduce the toxicity, mobility, or volume of hazardous substances, pollutants, or contaminants through treatment."

Comments on ARARs

26. Comment: **Page 6-4, discussion of Res. 88-63. Why is the sentence regarding groundwater west of Saratoga Street relevant? We recommend that the Navy include at the end of this discussion a conclusion that 88-63 is an ARAR.**

Response: The Navy has identified State Water Resources Control Board (SWRCB) Resolution (Res.) 88-63 as a state ARAR in the first sentence of the SWRCB Res. 88-63 subsection.

The Navy will delete the final paragraph in the SWRCB Res. 88-63 subsection.

27. Comment: **Page 6-5, fourth paragraph, statement that a CERCLA remedial action is not necessary leaves the reader hanging. Please either explain, or refer to the section of the document that explains the rationale.**

Response: Please see the response to EPA General Counsel Comment 23.

28. Comment: **P. 6-5, lack of MCLs for 1,3-DCB. Are there any TBCs such as federal or state health advisories?**

Response: EPA has issued a lifetime health advisory of 600 µg/L for 1,3-dichlorobenzene at Site 16. The Navy has set a risk-based remediation goal of 5.5 µg/L and does not think this lifetime health advisory is a criterion TBC.

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

29. **Comment:** Page 6-9, soil ARARs. Please also add stormwater requirements.

Response: The Navy will revise the action-specific ARARs in Section 6.2.3.1, Soil Remedies, to read as follows:

- "Clean Water Act § 402(p) and its implementing regulations at 40 CFR § 122.44(k)(2) and (4) require best management practices to control or abate stormwater discharges

On November 16, 1990, EPA final regulations implementing Clean Water Act § 402(p) setting forth the requirements for the Phase I Stormwater National Pollution Discharge Elimination System (NPDES) permit requirements were promulgated (55 Fed. Reg. 47990). EPA's Phase I Stormwater NPDES regulations require that owners and operators of construction activities obtain permit coverage and be in compliance with discharge standards. The Phase II Stormwater Rule was promulgated on December 8, 1999. On March 10, 2003, the new Phase II regulations came into effect. The Phase II requirements effectively lowered the size limit on construction activities covered by the requirements from those activities disturbing 5 acres or more (Phase I) to 1 acre or more (Phase II).

Under the Clean Water Act and its implementing regulations, NPDES permits or coverage under promulgated stormwater general permits are required for construction that disturbs at least 1 acre. The State of California has promulgated a stormwater general permit at Order Number 99-08-DWQ. Under CERCLA § 121(e)(1), no federal, state, or local permit is required for any remedial action conducted entirely on site when it is selected and carried out in compliance with CERCLA § 121. Therefore, the Navy is not required to obtain an individual stormwater permit or submit a notice of intent to discharge under the state's general permit. However, the Navy will use the substantive requirements of the state's general permit as TBC criteria for complying with the requirement to apply best management practices for stormwater discharges promulgated under the Clean Water Act § 402(p), 40 CFR § 122.44(k)(2) and (4), and related state laws.

The Navy will comply with these Clean Water Act ARARs for each site where soil sampling results indicate that excavation is necessary and that excavation at the site will disturb 1 or more acres."

RESPONSES TO COMMENTS FROM EPA'S OFFICE OF REGIONAL COUNSEL (CONTINUED)

30. Comment: Table 6-1, p. 2, comments column. Instead of the last sentence in each Comments box, we recommend saying: No CERCLA remedy is selected in this ROD for Site 7 or 8 groundwater.

Response: The Navy will revise the comments column as follows: "No CERCLA action is necessary for Site 7 groundwater because groundwater will be addressed under the Alameda Point TPH program. No CERCLA remedial action is necessary for Site 8; analytical results from 2002 through 2006 for the basewide groundwater monitoring program show that benzene was sporadically detected at concentrations both above and below the MCL and that TCE was consistently detected at concentrations below the MCL. Benzene contamination will be evaluated under the Alameda Point TPH program."

31. Comment: Table 6-2, p. 2, ESA, last column. The comment says there is no habitat suitable for migratory birds. Is this the intended language? It is different from the statement regarding the least tern on page 3.

Response: Please see the response to EPA General Counsel Comment 24. The Navy has determined that the Endangered Species Act of 1973 is not an ARAR and will remove it from Table 6-2.

32. Comment: Table 6-2, page 3, California ESA, and also page 2, ESA. It is not sufficient to say that there is no habitat or no unacceptable risk under current conditions. The Navy also needs to ensure that the remedial action itself (esp. excavation) does not harm endangered or threatened species.

Response: Please see the response to EPA General Counsel Comment 24.

33. Comment: Table 6-3, p. 1, Action-Specific ARARs for excavation. Stormwater requirements should be included also.

Response: The Navy will revise Table 6-3 to include Clean Water Act stormwater requirements. Please also see the response to EPA General Counsel Comment 29.

RESPONSES TO COMMENTS FROM EPA HEADQUARTERS

- Comment:** Regarding Checklist Item 1: Why isn't the groundwater remediation area located within the map's (Figures 2-4 and Figure 5-3) LUC boundary? The LUC boundary should cover the entire groundwater plume until RGs are reached. In the draft final ROD, please revise the LUC boundaries on the figures to include the entire groundwater plume at each site.

Response: The referenced figures will be revised so that the institutional control boundary encompasses the groundwater remediation area.

RESPONSES TO COMMENTS FROM THE WATER BOARD

1. **Comment:** **Page 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.**

Response: The first sentence of this paragraph will be modified to read as follows: “This ROD selects active remediation of groundwater for IR Sites 6 and 16; no action under CERCLA for groundwater is recommended at IR Sites 7 and 8 because concentrations of CERCLA contaminants are low and do not pose an unacceptable risk for current or proposed future site uses.”

Please see response to EPA Specific Comment 2. Please see Sections 3.2.2.4 and 4.2.2.4 of the OU-1 Site 6, 7, 8, and 16 ROD for details regarding the status of TPH activities at Sites 7 and 8, respectively.

2. **Comment:** **Page 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.**

Response: Please see the response to EPA’s Specific Comment 4.

3. **Comment:** **Section 1.1, Page 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.**

Response: The following sentence will be added after the first sentence of Section 1.1: “Sites 6, 7, 8, and 16, which are part of OU-1, were grouped together because they were mostly used for light industrial purposes.”

RESPONSES TO COMMENTS FROM THE WATER BOARD (CONTINUED)

4. **Comment:** Section 2.2.2.1, Page 2-6. 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.

Response: This comment is noted. The sentence will be revised to include “potentially.”

5. **Comment:** Section 2.2.2.1, Page 2-7. 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 Interim Final Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater 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.

Response: The last paragraph on Page 2-7 indicates that data from 2002 to 2005 were not compared with the environmental screening levels (ESL) that came out in 2005. The ROD is based on the results of the RI Report dated November 18, 2004 (Tetra Tech 2004) and the FS Report dated June 15, 2005 (SulTech 2005). Both of these reports have been accepted as final by the regulatory agencies. Therefore, the Navy is not planning to revise the ROD to address the February 2005 ESLs.

The last sentence will be revised as follows: “All TPH concentrations have remained constant or declined basewide over time (ITSI 2006).”

6. **Comment:** Section 2.2.2.2, Page 2-10. 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.

Response: Please see response to EPA Specific Comment 12. Section 2.2.2.2 will be revised to include the date of the site walk (June 19, 2006). This date will be included throughout the document where necessary. The NAS GAP 25

RESPONSES TO COMMENTS FROM THE WATER BOARD (CONTINUED)

paragraph in Section 2.2.2.2 will be revised as follows: “NAS GAP 25 consisted of various sized containers, including 55-gallon storage drums on concrete pavement in and around a fenced area. Containers were placed on top of wooden pallets and within metal sheds. This SWMU measured approximately 70 feet by 30 feet and is located outside of Building 41 within WD 040. DTSC conducted an RFA of NAS Alameda in 1992, while the base was still operational. This RFA included GAP 25 and concluded (based on observations of the unit in operation) that there was a low potential of release from the unit and no RCRA facility investigation was necessary for this unit. According to the RFA, NAS GAP 25 exhibited a low potential for releases into soil and groundwater because the SWMU was on concrete pavement (DTSC 1992). The RI for Site 6 did not identify NAS GAP 25 as a likely source of contamination (Tetra Tech 2004). During a 2002 site visit, no staining was observed near this NAS GAP 25 or within the associated concrete expansion joints (SulTech 2004). The Navy and regulatory agencies have determined that no further corrective action is required for NAS GAP 25.”

7. **Comment:** Section 2.2.2.4, Page 2-11. 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.

Response: The last sentence of the first paragraph will be deleted because it is erroneous.

8. **Comment:** Section 2.5.3.1, Page 2-16. 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.

Response: Please see the response to EPA Regional Counsel Comment 2.

RESPONSES TO COMMENTS FROM THE WATER BOARD (CONTINUED)

9. **Comment:** **Section 2.5.3.1, Page 2-17. 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.**

Response: The last paragraph of Section 2.5.3.1 will be modified to read as follows: “OWSs 040A and 040B, although located outside the Site 6 boundary (see Figure 2-1), are directly related to activities that occurred at Site 6 and are being addressed under the CERCLA program for Site 6. The Site 6 boundary will be modified if soil beneath or adjacent to OWSs 040A or 040B contain COCs above remediation goals.”

10. **Comment:** **Section 2.6.2, Page 2-19. 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.**

Response: As stated in EPA Specific Comment 15, the last two paragraphs on Page 2-19 will be deleted to avoid confusion.

11. **Comment:** **Section 2.8.2, Page 2-25. 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.**

Response: The following text will be inserted after the second sentence in Section 2.6.2: “The aquifer is currently designated in the Basin Plan as suitable for drinking water supply (Water Board 2000).”

RESPONSES TO COMMENTS FROM THE WATER BOARD (CONTINUED)

12. **Comment:** **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.**

Response: The risk assessment is intended to address only potentially significant exposures to COCs. The risk assessment does not consider incidental contact with groundwater by occupational workers. Well construction standards do not permit installation of a well into the first-water bearing zone, so businesses would not be able to use that aquifer as a source of drinking water for employees. Thus, there is no complete pathway. Construction workers do not routinely ingest groundwater; therefore, this exposure pathway to groundwater was not evaluated for construction workers by the risk assessment process. A similar logic exists for why the exposure pathways noted in the comment for ecological receptors were not evaluated. The site is paved; therefore, there is little or no opportunity for the mentioned pathways to result in exposure. The ROD will be revised to include this rationale.

13. **Comment:** **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?**

Response: If contamination is identified at OWSs 040A or 040B, it will be addressed in a manner consistent with the RAO for soil at Site 6. The following text will be added to Section 2.5.3.1: "OWSs 040A and 040B, although located outside the Site 6 boundary (see Figure 2-1), are directly related to activities that occurred at Site 6 and are being addressed under the CERCLA program for Site 6. The Site 6 boundary will be modified if soil beneath or adjacent to OWSs 040A or 040B contain COCs above remediation goals."

14. **Comment:** **Figure 2-5. The letters in several boxes in this flow chart overlap with one another. Please edit boxes appropriately.**

Response: This comment is noted. The figure will be revised as requested.

15. **Comment:** **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.**

RESPONSES TO COMMENTS FROM THE WATER BOARD (CONTINUED)

- Response:** This information will not be provided based on the decisions made during the development of the Alameda Point ROD template. These decisions incorporate the assumption that the length and overall readability of a ROD is improved greatly by relying on the RI Report as the appropriate document for presenting details from the investigation. No change will be made to the text of the ROD as a result of this comment.
16. **Comment:** **Section 3.2.2.1, Page 3-6. 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”.**
- Response:** Please see the response to EPA Specific Comment 27.
17. **Comment:** **Section 3.2.2.3, Page 3-8. 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.**
- Response:** The following summary of results will be added to the end of the third paragraph: “During the Phase 2B sampling, eight soil and one direct-push groundwater sample were collected. Analytical results from the Phase 2B investigation indicated that TPH was detected in soil samples at concentrations below petroleum risk-based screening levels and TPH criteria. No VOCs were detected in soil, and the VOC concentrations detected in the groundwater sample were less than their respective PRGs. SVOC PAHs were detected in soil from one sampling location at a concentration above PRGs, and B(a)P was detected in soil from one sampling location at a concentration above the PRG. Metals were detected at concentrations that exceeded the 1996 PRGs and background metals concentrations (Tetra Tech 2004).”
18. **Comment:** **Section 3.2.2.4, Page 3-10. 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.**
- Response:** The ROD is designed to be a concise document that presents the summary of CERCLA activities. The corrective action investigation activities at Site 7 are being addressed under the Alameda Point TPH program. The Alameda Point TPH program investigations discussed in the ROD are intended to summarize the status and results of these investigations.

RESPONSES TO COMMENTS FROM THE WATER BOARD (CONTINUED)

19. **Comment:** Section 3.5.3.1, Page 3-12. 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 above PRGs, or infrequently detected, but when they were detected, they were below PRGs. Please clarify.

Response: Please see the response to EPA Specific Comment 33.

20. **Comment:** Section 3.5.3.2, Page 3-13. 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.

Response: Groundwater at Site 7 contains petroleum-related contamination (metals, VOCs, SVOCs, and PAHs). Groundwater at Site 7 also contained elevated concentrations of arsenic and PAHs that were likely mobilized from fill material by the presence of petroleum-related products that altered subsurface chemical conditions at the site. As noted in the response to EPA Specific Comment 44, the risk assessment results were skewed by a high value; however, recent groundwater monitoring data show that arsenic levels have decreased substantially and are frequently less than the MCL. Concentrations of PAHs in recent groundwater monitoring data generally show nondetected PAH concentrations. Thus, there does not appear to be any ongoing commingled groundwater contamination. The first paragraph of Section 3.5.3.2 (now the last paragraph) will be revised as follows: Groundwater at Site 7 contains petroleum-related contamination. Groundwater at Site 7 also contains elevated concentrations of arsenic and PAHs that were likely mobilized from fill material by the presence of petroleum-related products that have altered the subsurface chemical conditions at the site (see Table 3-6). It is anticipated that remediation activities being conducted under the Alameda Point TPH program will reduce arsenic and PAH concentrations in groundwater at Site 7. Recent groundwater monitoring data show that arsenic levels have decreased substantially and are frequently less than the MCL (ITSI 2006). Concentrations of PAHs in recent groundwater monitoring data generally show nondetected PAH concentrations (ITSI 2006). Thus, there does not appear to be any ongoing commingled groundwater contamination. As a result, the OU-1 Sites 6, 7, 8, and 16 RI

RESPONSES TO COMMENTS FROM THE WATER BOARD (CONTINUED)

Report recommended no action for groundwater under CERCLA at Site 7 (Tetra Tech 2004).

21. **Comment:** Section 3.12.1, Page 3-23. 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?

Response: The Navy is conducting the sampling only for confirmation purposes. The Navy is not proposing any groundwater remediation at this time. If unacceptable levels of petroleum-related contaminants are found, soil and groundwater will be remediated under the Alameda Point TPH program.

22. **Comment:** Tables 2-6, 3-6, 4-6, 5-6, and 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 µg/L. In Table 4-6 it's shown as 0.45 µg/L.

Response: This comment is noted. The units will be compared to those presented in the RI Report, and the tables will be revised as necessary.

23. **Comment:** Section 4.2.2.1, Page 4-5. 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.

Response: Section 4.2.2.1 will be revised as follows: “The industrial activities potentially affecting the storm sewer system were conducted in Building 114 (IT Corp. 1997). Two VOC plumes, benzene and naphthalene, appeared to be associated with Site 8, and Building 114 was the likely source of contamination. The storm sewer system, co-located with the fuel lines of CAA 8, most likely served as a transport mechanism for these plumes (IT Corp. 1997).” Please see the response to EPA Regional Counsel Comment 15 for the discussion of the nature and extent of benzene and naphthalene in groundwater.

24. **Comment:** Section 4.2.2.1, Page 4-6. CERCLA Investigations – Basewide Groundwater Monitoring, 2002-2005 – Third Paragraph – This paragraph mentioned that benzene concentrations have been

RESPONSES TO COMMENTS FROM THE WATER BOARD (CONTINUED)

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.

Response: The third paragraph of Section 4.2.2.1 will be deleted because the statement is outdated and does not take into account data from 2005 and 2006. The following text will be inserted into Section 4.2.2.1: "Concentrations of benzene were sporadically detected above and below the MCL from 2002 through 2006."

25. Comment: **Section 4.2.2.2, Page 4-8. 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.**

Response: Please see the response to EPA Office of Regional Counsel Comment 15. The conclusion regarding no CERCLA action for groundwater at Site 8 will be placed in Section 4.7.1.4.

26. Comment: **Section 4.5.3.1, Page 4-11. 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.**

Response: This comment is noted. The third and fourth paragraphs in Section 4.5.3.1 will be replaced as follows:

"All non-PAH SVOCs were detected at concentrations below their respective PRGs. Seven PAH SVOCs were detected at concentrations above EPA 2002 residential PRGs (EPA 2002a) (see Table 4-5). However, PAHs are not COCs at Site 8, and PAH concentrations are below the site average threshold level of 0.62 mg/kg for B(a)P-equivalent chemicals. The horizontal and vertical spatial pattern of detections of PAH SVOCs was not indicative of a release at Site 8. The source of

RESPONSES TO COMMENTS FROM THE WATER BOARD (CONTINUED)

PAHs is attributable to materials dredged from San Francisco Bay used to construct Alameda Point. Consequently, the RI Report recommends no CERCLA action for PAHs at Site 8.”

27. **Comment:** **Tables 2-9, 3-8, 4-8, and 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.**

Response: The tables present total risk. The footnote on the tables will be modified to indicate that total risk is presented. In addition, the following text will be added to Section 4.7.3 to show why no action is necessary for groundwater at Site 8: “No COCs were identified for groundwater because the risk assessment results were based on historical data. Analytical results from 2002 through 2006 for the basewide groundwater monitoring program (Shaw 2003a and 2003c; ITSI 2006) show that benzene was sporadically detected at concentrations both above and below the MCL; therefore, benzene contamination will be evaluated under the Alameda Point TPH program.”

28. **Comment:** **Section 5.2.2.1, Page 5-7. 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.**

Response: The following sentence will be added to the end of the paragraph: “B(a)P-equivalent concentrations were detected in soil samples from all 183 sampling locations; however, none of the samples collected exhibited a B(a)P-equivalent concentration exceeding the site average threshold level of 0.62 mg/kg for B(a)P-equivalent chemicals (Tetra Tech 2004).”

29. **Comment:** **Section 5.5.3.1, Page 5-12. 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**

RESPONSES TO COMMENTS FROM THE WATER BOARD (CONTINUED)

included in the risk assessment process, along with CERCLA contaminants, in order to develop an overall risk for the site.

Response: VOCs were detected in soil at Site 16; however, they were not present at concentrations exceeding EPA residential PRGs. The third paragraph of Section 5.5.3.1 will be revised as follows: "VOCs were detected in soil at Site 16; however, they were not present at concentrations exceeding EPA residential PRGs. SVOCs, excluding PAHs, were sporadically detected at Site 16. All non-PAH SVOCs were detected at concentrations below their respective PRGs. One PAH SVOC (B[a]P) was detected at a concentration above the EPA 2002 residential PRG (EPA 2002a) (see Table 5-5). Therefore, PAHs are not COCs at Site 16 and PAH concentrations are below the site average threshold level of 0.62 mg/kg for B(a)P-equivalent chemicals. The horizontal and vertical spatial pattern of detections was not indicative of a release at Site 16. The source of PAHs is attributable to materials dredged from San Francisco Bay used to construct Alameda Point."

The last sentence in fifth paragraph of Section 5.7.1.3 will be revised as follows: "PAH SVOCs were not identified as risk drivers at Site 16 and are therefore not considered COCs."

30. Comment: **Figure 5-1 and 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?**

Response: The blue dashed boundary in Figure 5-1 illustrates the CERCLA IR Site 16 boundary, and the purple boundary in Figure 5-3 illustrates the IR Site 16 IC boundary. The CERCLA IR Site 16 boundary will be added to Figure 5-3. The groundwater flow direction will also be added to Figure 5-3.

Aboveground storage tanks (AST) 620 is located in Environmental Baseline Survey Parcel 12, and was used to store gasoline. The Navy recommended no further corrective action for AST 620 (SulTech 2004). In addition, AST 620 is within a containment area; therefore, it is unlikely that contamination resulted from that tank. The ROD will not be revised to include this information since AST 620 is not considered an OU-1 SWMU.

RESPONSES TO COMMENTS FROM DTSC

1. **Comment:** The Navy has not provided clear justification in the ROD for leaving contaminants in place that result in a cumulative site risk that are greater than 1×10^{-6} . The Navy should rewrite the sections titled "Soil Risk Characterization," and "Groundwater Risk Characterization," to provide more details as to why remediation has not been proposed for soil. The following bullets highlight some of the ambiguities that are present in the ROD:

- It is not clear from the ROD if Sites 6 and 16 are being remediated to unrestricted use or if they are being remediated to commercial/industrial use with institutional controls.
- The Site 7 discussion of the debris area and the nondebris area is confusing. It is not clear in the text whether or not the debris area has been excavated, nor is it clear that any soil, other than that associated with oil water separator (OWS) 459, is planned for excavation.
- The risks from Site 8 soil are from arsenic, which is dismissed as attributed to background, dieldrin, and polychlorinated biphenyls. Remediation is not proposed for soil other than that proposed for the northwest corner of Site 8. Does the cancer risk of 6×10^{-5} for residential use of Site 8 include the northwest corner? Does the Navy anticipate that the site risk will meet the 1×10^{-6} criterion after remediation of the northwest corner?
- It is not stated frequently enough or clearly enough that the groundwater plumes at Sites 7 and 8 will be remediated under the total petroleum hydrocarbon (TPH) program. Moreover, the statement is made in association with Site 8 that there are no Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) contaminants at Site 8 groundwater, but trichloroethylene has been detected in groundwater, which is a CERCLA contaminant.

Response: To address the first paragraph of this comment, the Navy will revise Section 6.1, Protection of Human Health and the Environment, to include the language below that supports the risk decisions for leaving certain COCs in place.

The NCP at 40 CFR § 300.430(d) calls for a site-specific baseline risk assessment, as appropriate, to characterize the current and potential threats to human health and the environment. The primary purpose of the baseline risk assessment is to provide an understanding of the actual and potential risks to human health and the environment and any uncertainties associated with the risk assessment (EPA 1991). The results of the risk assessment are used to establish the basis for a remedial action (EPA

RESPONSES TO COMMENTS FROM DTSC (CONTINUED)

1991). Generally, when the baseline risk assessment indicates that a cumulative site risk exceeds an excess lifetime cancer risk of 10^{-4} , action is warranted (EPA 1991). For sites where the cumulative site risk to an individual is less than 10^{-4} for both current and future land use, action generally is not warranted (EPA 1991).

Once a decision is made that the risks posed by the CERCLA releases warrant a response action, the NCP at 40 CFR § 300.430(e)(2)(i)(A)(2) states that “(t)he 10^{-6} risk level shall be used for the point of departure for determining remediation goals for alternatives when ARARs are not available or are not sufficiently protective because of the presence of multiple contaminants at a site or multiple pathways of exposure.” For groundwater, the Navy has identified federal and state MCLs as chemical-specific ARARs at Sites 6 and 16 because the groundwater at these sites is considered a potential drinking water source. Although MCLs may be set within the risk management range, MCLs are considered protective of drinking water sources. For soil, the Navy has identified the TSCA risk-based ARAR to support a concentration level of 1 mg/kg total PCBs, a level considered protective of high-occupancy uses (such as residential) as a chemical-specific ARAR for soil at Sites 8 and 16. The MCLs for groundwater and the TSCA ARAR for soil are sufficiently protective of human health and the environment for these OU-1 sites, so the Navy has used them to set remediation goals.

When there are no ARARs that determine remediation goals, 40 CFR § 300.430(e)(2)(i)(A)(3) sets forth the factors below to consider when establishing remediation goals in the context of the risk management range.

Preliminary remediation goals for carcinogens are set at a 10^{-6} excess cancer risk as a point of departure, but may be revised to a different risk level within the acceptable risk range based on the consideration of appropriate factors including but not limited to exposure factors, uncertainty, and technical limitations.

There is a high level of confidence that the risk assessment results, including identification of COCs, the exposure factors, and uncertainty analysis, provide an adequate, even conservative representation of site conditions and can be used to support risk management decisions so that risks within the risk management range are protective of human health. In addition, the Navy will implement ICs to protect against short-term risks from groundwater until groundwater remediation goals are met.

Responses to the bulleted list of ambiguities provided in the comment are presented below.

First bullet: Sections 2.12.1.1 and 5.12.1.1 will be revised to include the following clarifying language: “The current planned future use is

RESPONSES TO COMMENTS FROM DTSC (CONTINUED)

commercial/industrial. The risk analysis demonstrates that the existing risk is within the risk management range for unrestricted use and therefore would not require ICs. The Navy has agreed to conduct further investigation of the OWSs. If COCs are identified during this investigation, the Navy presumes that overexcavation of soils beneath and adjacent to the OWSs to a level consistent with unrestricted use would be as cost-effective as removing soils consistent with commercial/industrial use and applying a land use restriction.”

Second bullet: The Site 7 discussion of the debris area and the nondebris area will be clarified throughout Section 3. The second sentence of the “Total Petroleum Hydrocarbons- and Lead-Contaminated Soil Removal Action, 2002” of Section 3.2.2.4 will be revised as follows: “An attempt was made to remove the debris layer by excavating two small areas of surface soil (see Figure 3-1); however, excavation activities were halted so that additional evaluation of the nature and extent of the debris layer could be performed.” The first sentence in Section 3.5.3.1 will be revised to as follows: “During the 2002 TPH- and lead-contaminated soil removal action at Site 7, a blue, crystalline, metal debris layer was identified in shallow soils in the parking area near the footprint of the former incinerator.” The first sentence in Section 3.12.2.2 will be replaced with the following two sentences: “Soil within the Site 7 debris area containing arsenic at concentrations above the Alameda Point background concentration, cadmium at concentrations above the EPA 2004 residential PRG, and lead at concentrations above 230 mg/kg will be excavated as part of the remedy for Site 7. In addition, excavation would also be performed to remove potentially contaminated soil beneath and adjacent to OWS 459 that pose unacceptable risk.”

Third bullet: The cancer risks for Site 8 include the northeast corner. The Navy anticipates the incremental risk will be reduced to 1×10^{-6} or lower after excavation of soil contaminated with COCs above the remedial goals in the northeast corner. Albeit, arsenic will still contribute to the total site risk; however, it does not exceed the Alameda Point background concentration.

Fourth bullet: Please see the response to EPA Regional Counsel Comment 15.

2. **Comment:** **Our second overarching comment refers to the disjointed nature of the discussions on previous investigations, presented at the beginning of each section. For example, in Section 2.2.1 CERCLA Investigation Activities, under “Follow-on Investigation to Installation Restoration Program Phase 2B and Phase 3 Sites, 1994,” it is very jarring to read, “Previous investigations indicated elevated concentrations of beryllium and PAHs in surface soil and VOCs in groundwater.” Does**

RESPONSES TO COMMENTS FROM DTSC (CONTINUED)

the “previous investigations” refer to the “IR Program Phases 2B and 3 Investigations” paragraph that precedes the “Follow-on” paragraph? Or perhaps it refers to the Initial Assessment Study, described in the paragraph prior to that? We are not asking for extensive revision of these parts. However, it would be very helpful if the discussions of various investigations could refer back to each other, rather than treating each investigation as a stand-alone project.

Response: This comment is noted. The discussions will be revised where appropriate as requested.

3. **Comment:** The language used in Chapter 6, Statutory Determinations, should match the agreed-on language used in the Site 26 ROD. Please remove (a) and (e)(1) from the bulleted items on page 6.10 (first of three bullets), so that it reads, “DTSC land use control requirements at Cal. Code Regs. tit 22, section 67391.1. Additionally, the last sentence of the first partial paragraph at the top of page 6-11 of the Draft OU-1 ROD states, “These covenants would be recorded with the environmental restriction covenant and agreement and run with the land.” This language is ambiguous and should be replaced with Site 26 ROD language, which states, “These covenants would be recorded with the Covenant to Restrict Use of Property and run with the land.” The next paragraph on page 6-11 of the Draft OU-1 ROD contains similar, confusing language. Please replace the statement, “These substantive provisions will be implemented by incorporation of restrictive environmental covenants in the environmental restriction covenant and agreement at the time of transfer for purposes of protecting present and future public health and safety,” with the statement from the Site 26 ROD, specifically, “This substantive provision will be implemented by incorporation of restrictive environmental covenants in the Covenant to Restrict Use of Property at the time of transfer for purposes of protecting present and future public health and safety.” All of Section 6.2.3.2 should be reviewed and any language that references land use control requirements should correspond exactly to the agreed-on language used in the Site 26 ROD.

RESPONSES TO COMMENTS FROM DTSC (CONTINUED)

Response: The Navy will revise the language contained in Section 6.2.3.2 as follows:

“The substantive provisions of the following state statutes and regulations have been accepted by Navy as relevant and appropriate state ARARs for implementing ICs and entering into a “Covenant to Restrict Use of Property” with DTSC:

- *California Civil Code* Land Use Controls § 1471
- *California Health and Safety Code Land Use Controls* §§ 25202.5, 25222.1, 25232(b)(1)(A) – (E), 25233(c), 25234, and 25355.5(a)(1)(C)
- Cal. Code Regs. tit. 22, § 67391.1

The substantive provisions of California Civil Code § 1471 are the following general narrative standard: “... to do or refrain from doing some act on his or her own land ... where...: (c) Each such act relates to the use of land and each such act is reasonably necessary to protect present or future human health or safety of the environment as a result of the presence on the land of hazardous materials, as defined in § 25260 of the Health and Safety Code.” This narrative standard would be implemented through incorporation of restrictive environmental covenants in the deed at the time of transfer. These covenants would be recorded with the “Covenant to Restrict Use of Property” and run with the land.

The substantive provision of California Health and Safety Code § 25202.5 is the general narrative standard to restrict “present and future uses of all or part of the land on which the ... facility ... is located ...” This substantive provision will be implemented by incorporation of restrictive environmental covenants in the “Covenant to Restrict Use of Property” at the time of transfer for the purposes of protecting present and future public health and safety.

California Health and Safety Code §§ 25222.1 and California Health and Safety Code § 25355.5(a)(1)(C) provide the authority for the state to enter into voluntary agreements to establish land use covenants with the owner of property. The substantive requirements of the following California Health and Safety Code § 25222.1 provisions are relevant and appropriate: (1) the general narrative standard: “restricting specified uses of the property, ...” and (2) “... the agreement is irrevocable, and shall be recorded by the owner, ... as a hazardous waste easement, covenant, restriction or servitude, or any combination thereof, as appropriate, upon

RESPONSES TO COMMENTS FROM DTSC (CONTINUED)

the present and future uses of the land.” The substantive requirements of the following California Health and Safety Code § 25355.5(a)(1)(C) provisions are “relevant and appropriate”: “... execution and recording of a written instrument that imposes and easement, covenant, restriction, or servitude, or combination thereof, as appropriate, upon the present and future uses of the land.”

The Navy will comply with the substantive requirements of California Health and Safety Code §§ 25222.1 and 25355.5 (a)(1)(C) by incorporating CERCLA use restrictions into the Navy’s deed of conveyance in the form of restrictive covenants under the authority of California Civil Code § 1471. The substantive provisions of California Health and Safety Code §§ 25222.1 and 25355.5 (a)(1)(C) may be interpreted in a manner that is consistent with the substantive provisions of California Civil Code § 1471. The covenants shall be recorded with the deed and run with the land.

Actual land-use restriction requirements are set forth in Cal. Health and Safety Code § 25232(b)(1)(A) through (E). These include prohibitions on construction of residences, hospitals for humans, schools for persons under 21 years of age, daycare centers, or any permanently occupied human habitation on hazardous waste property. California Health and Safety Code § 25233(c) sets forth relevant and appropriate substantive criteria for granting variances from the prohibited uses set forth in California Health and Safety Code § 25232(b) (i.e. a residence used for permanently occupied human habitation, a hospital for humans, a school for persons under 21 years of age, a daycare center for children, and any permanently occupied human habitation) based on specified environmental and health criteria. California Health and Safety Code § 25234 sets forth the following relevant and appropriate substantive criteria for the removal of a land-use restriction on the grounds that “... the waste no longer creates a significant existing or potential hazard to present or future public health or safety.”

In addition to being implemented through the “Covenant to Restrict Use of Property” between the Navy and DTSC, the appropriate and relevant portions of California Health and Safety Code §§ 25202.5, 25222.1, 25232(b)(1)(A) – (E), 25233(c), 25234, and 25355.5(a)(1)(C) and California Civil Code § 1471 shall also be implemented through the deed between the Navy and the transferee.

DTSC promulgated a regulation on April 19, 2003, regarding “Requirements for Land-Use Covenants” at Cal. Code Regs., tit. 22,

RESPONSES TO COMMENTS FROM DTSC (CONTINUED)

§ 67391.1. The substantive provisions of this regulation have been determined to be relevant and appropriate state ARARs by the Navy.

EPA agrees that the substantive portions of the state statutes and regulations referenced in this section are ARARs. EPA considers the following portions of Cal. Code Regs. tit. 22, § 67391.1 to be relevant and appropriate for this ROD: Cal. Code Regs. tit. 22, §§ 67391.1(a)(1), (a)(2), (d), (e)(1), and (e)(2). DTSC's position is that all of the state statutes and regulations referenced in this section are ARARs.

REFERENCES

- Department of Toxic Substances Control (DTSC). 1992. "RCRA Facility Assessment, Naval Air Station, Alameda, California." April.
- DTSC. 2005. Letter Providing DTSC Comments on the Draft OU-1 Sites 6, 7, 8 and 16 Proposed Plan. From DTSC. To Thomas Macchiarella, Base Realignment and Closure (BRAC) Environmental Coordinator, BRAC Program Management Office West. December 29.
- Innovative Technical Solutions, Inc. (ITSI). 2006. "Spring 2006 Alameda Basewide Annual Groundwater Monitoring Report." October.
- International Technology Corporation (IT Corp.). 2001a. "Environmental Baseline Survey Data Evaluation Summaries, Alameda Point, California." Final. January.
- Naval Energy and Environmental Support Activity (NEESA). 1983. "Initial Assessment Study of Naval Air Station Alameda, California." Final Report. Prepared by Ecology and Environment. April.
- San Francisco Bay Regional Water Quality Control Board (Water Board). 2000. "Proposed Groundwater Amendments to the Water Quality Control Plan (Basin Plan)." February.
- Shaw Environmental & Infrastructure, Inc. (Shaw). 2003a. "Draft Final Work Plan for Basewide Groundwater Monitoring Program, Alameda Point, Alameda, California." June.
- Shaw. 2003b. Letter Regarding Site 7 Excavation at Building 459, Alameda Point, Alameda, California. From David Poley, Shaw. To Neal Hutchison, Tetra Tech EM Inc. March 26.
- Shaw. 2003c. "Groundwater Monitoring Report for Installation Restoration Site 8 Summer 2002 to Spring 2003." July.
- Steven Peck and Dot Lofstrom. 2007. Telephone Conference between Steven Peck, Project Manager, Alameda Point Team, BRAC Program Management Office West and Dot Lofstrom, DTSC at 13:20 Regarding No Further Corrective Action for NAS GAP 25. April 4.
- SulTech. 2004. "Draft Appendix I Solid Waste Management Unit Evaluation Report for Operable Unit 1 (Sites 6, 7, 8, and 16), Hazardous Waste Permit EPA ID Number CA 2170023236, Naval Air Station Alameda, Alameda Point, Alameda, California." September 30.
- SulTech. 2005. "Final Feasibility Study Report for Operable Unit I Sites 6, 7, 8, and 16." Prepared for BRAC Program Management Office West. July 18.

REFERENCES (CONTINUED)

- Tetra Tech EM Inc. (Tetra Tech). 2001c. "Evaluation of Total Petroleum Hydrocarbons at Environmental Baseline Survey Parcels at Alameda Point, Alameda, California." Prepared for Naval Facilities Engineering Command, Southwest Division. October 19.
- Tetra Tech. 2003b. "Final Technical Memorandum: Evaluation of Issues Related to the Resource Conservation and Recovery Act (RCRA) Facility Permit EPA ID CA 2170023236, Tiered Permits, and the Nonpermitted Areas at Alameda Point, Alameda California." Prepared for Naval Facilities Engineering Command, Southwest Division. May 7.
- Tetra Tech. 2003d. "Site 7 Supplemental Sampling and Analysis Plan." October 7.
- Tetra Tech. 2004. "Final Remedial Investigation Report, Sites 6, 7, 8, and 16, Alameda Point, Alameda, California." Prepared for Naval Facilities Engineering Command, Southwest Division. November 18.
- U.S. Department of the Navy (Navy) and Tetra Tech, Inc. 1997. "The Biological Assessment for Disposal and Reuse of NAS Alameda and Fleet and Industrial Supply Center, Alameda Facility and Annex, Alameda, California." September.
- U.S. Environmental Protection Agency (EPA). 1991. "Role of Baseline Risk Assessment in Superfund Remedy Selection Decisions." Office of Solid Waste and Emergency Response (OSWER) Directive 9355.0-30. April 22.
- EPA. 2002a. "Region IX Preliminary Remediation Goals." Accessed in July 2003 for the OU-1 Sites 6, 7, 8, and 16 Remedial Investigation Report. On-Line Address in July 2003: <http://www.epa.gov/region9/waste/sfund/prg/index.htm>.

SulTech

A Joint Venture of Sullivan Consulting Group and Tetra Tech EM Inc.

TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. **N68711-03-D-5104**

Document Control No. DS . B098 . 21450

TO: Contracting Officer
Karen Rooney, Code 02RE
Naval Facilities Engineering Command
Southwest Division
1230 Columbia Street, Suite 870
San Diego, CA 92101-8517

DATE: 05/01/07
CTO: 0098
LOCATION:
Alameda Point, Alameda, California

FROM:



Steven Bradley, Contract Manager

DOCUMENT TITLE AND DATE:

**Responses to Regulatory Agency Comments on the Draft Record of Decision for Operable Unit 1,
Installation Restoration Sites 6, 7, 8, and 16, Alameda Point, Alameda, California**

TYPE: Contractual Deliverable Technical Deliverable (DS) Other (TC)

VERSION: Draft REVISION #: NA
(e.g., Draft, Draft Final, Final)

ADMIN RECORD: Yes No CATEGORY: Confidential

SCHEDULED DELIVERY DATE: 04/26/07 ACTUAL DELIVERY DATE: 05/01/07

NUMBER OF COPIES SUBMITTED TO NAVY:

0/9C/8E

O = original transmittal form
C = copy of transmittal form
E = enclosure
D = CD

COPIES TO: (Include Name, Navy Mail Code, and Number of Copies)

NAVY:

Steve Peck (BPMOW.SP)

O/4C/5E

Joyce Howell-Payne (BPMOW.JH)

1C + letter only

Nars Ancog (03EN.NA)

1C + letter only

Diane Silva (EVR.DS)

3C/3E

SulTech:

File/Doc Control

1C/1E (w/QC)

Deanna Rhoades

1C/1E

Craig Hunter

1C/1E

OTHER:

Anna-Marie Cook, US EPA (1E)

Dot Lofstrom, DTSC (2E)

Judy Huang, Water Board (1E)

Suzette Leith, US EPA (1E)

Date/Time Received

SulTech

A Joint Venture of Sullivan Consulting Group and Tetra Tech EM Inc.

TRANSMITTAL/DELIVERABLE RECEIPT (continued)

COPIES TO (continued): (Include Name, Navy Mail Code, and Number of Copies)

Navy (continued):

SulTech (continued):

OTHER (continued):

Debbie Potter, City of Alameda
1E

Peter Russell, Russell

Resources, Inc. (1E)

Peter Everds, Tetra Tech EC
Inc. (1E)