



California Regional Water Quality Control Board

San Francisco Bay Region



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Arnold Schwarzenegger
Governor

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ALAMEDA POINT
SSIC NO. 5090.3

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

Subject: Conditional Concurrence on the Fuel Line Corrective Action Area A No Further Action Report and Request for No Further Action, Alameda Point, Alameda

Dear Mr. Macchiarella:

Upon review of the above mentioned document, dated January 7, 2004, we have the following comments needing to be resolved before we can concur with your no further action request at CAA-A.

Groundwater Comments

1. While groundwater samples 030-FLI-521 and 030-FLI-523 taken near storm drains exhibited TTPH levels slightly above PRCs for marine ecological receptors exposed through the storm drain pathway, we concur that no further action is needed at these sample locations. We base our concurrence on the fact that all TPH-associated compound concentrations (e.g. BTEX) at these locations were below PRCs for ecological receptors and that groundwater samples adjacent to these locations were non-detect for TTPH and all TPH-associated compounds.
2. A high groundwater TTPH result of 32.56 mg/L at sampling location 030-FLI-512 necessitated the August 2001 data gap investigation to assess possible floating product at that location. This data gap investigation involved one soil boring advance to 10 feet bgs "within approximately 30 feet" of sampling location 030-FLI-512, where a piezometer was installed and found no floating product. No other confirmation sampling was conducted near 030-FLI-512. Furthermore, no more sampling was conducted at 030-FLI-512 to confirm high TTPH result or indicate if concentration is reducing over time.

While we are in concurrence that no floating product is present, based on low levels of BTEX constituents detected in the groundwater at 030-FLI-512 and the lack of floating product observed in the data gap investigation, we question if further site characterization is warranted in order to further evaluate the nature and extent of dissolved TTPH. Without sufficient site characterization, discussion of potential risks to future users, and a

proposal for reducing risks associated with this location (if needed), we cannot justify a no further action request at sample location 030-FLI-512.

Soil Comments

1. This report repeatedly identifies that there was only one soil sample collected with TPH and benzene slightly above residential PRCs (at sample location AP-04). Based on non-detect results for TPH-g and benzene in nearby soil samples AP-01 and AP-05, and non-detect result for benzene in nearby groundwater sample 030-FLI-519, we concur that no further action is needed at this sample location.

The narrative discussion in the report does not acknowledge the benzene result from sample location 030-FLI-123, where the detection limit for benzene (3.2 mg/kg) was about 5 times the residential PRC for Benzene (0.65 mg/kg). See Table 2-2 – Soil Analytical Data. The ‘non-detect’ result at this location does not eliminate our concern for this area on its own. Without comparison to nearby samples or collecting confirmation samples using a lower detection limit for benzene, no conclusions can be made regarding this sampling location.

The nearest CAA-A soil sample taken was at sample location 030-FLI-124 (about 100 feet away), with all results below PRCs. As sampling location 030-FLI-123 is immediately adjacent to CAA-6, please provide discussion of any results from samples collected in CAA-6 taken near 030-FLI-123 that could indicate whether benzene levels may be a concern at 030-FLI-123. With this in mind, please provide discussion regarding the uncertainty of the benzene result at sample location 030-FLI-123, and further justification for requesting no further action at this sample location.

Minor Comments

1. Page 8 – Step 4 – This paragraph mentions this is a non-residential area, whereas the rest of the report identifies this area as mixed use, with potential for residential use. Please correct this discrepancy.
2. Tables 4-3 thru 4-7 - Comparison of the AWQC storm drain exposure pathway PRC was done only for samples taken within 30 feet of a storm drain. Please include justification for why this distance was considered appropriate?
3. Table 4-8 – Results from 374-001 and PA01-05, while either N/A or N/D, are nevertheless within 250 feet of the shoreline. Footnotes for these results indicate they were not screened because they are greater than 250 feet from the shoreline. Please correct this discrepancy.

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With resolution of the above outstanding issues, we can concur with your no further action request at CAA-A. Prior to us sending a Case Closure letter for CAA-A, you will need to complete and submit a UST Site Closure Summary form and upload all pertinent information and reports to Geotracker.

Please contact me at (510) 622-2355 or email ersimon@waterboards.ca.gov to further discuss these remaining issues and to resolve any questions you may have.

Sincerely,

Erich Simon
Project Manager

CC (via US Mail and email):

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