



California Regional Water Quality Control Board

San Francisco Bay Region



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Arnold Schwarzenegger
Governor

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Department of the Navy
Base Realignment and Closure Program Management Office West
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ALAMEDA POINT
SSIC NO. 5090.3

**Subject: Comments on the Draft Report for Data Gap Sampling Installation
Restoration Site 26, Alameda Point, Alameda**

Dear Mr. Macchiarella:

Upon review of the *Draft Data Gap Sampling Installation Restoration Site 26*, dated October 2006 we have the following comments:

- Section 3.1 and Figure 4** – The Hydropunch investigation included sampling at 3 distinct depths to determine if contaminant plumes may be vertically distributed. The Hydropunch samples at the center of the plume (B20-SB-001) included sample depths at 4.5' to 7', 9.5' to 12', and 18.5' to 21', with the highest detections of all contaminants of concern detected in the 9.5' to 12' samples. All other Hydropunch samples, which were taken with the intent to help further delineate the plume both vertically and horizontally, were taken at depths of 7.5' to 10', 12.5' to 17', and 18.5' to 21'. As the B20-SB-001 Hydropunch samples at the center of the plume demonstrated that the highest concentrations may be limited to the 9.5' to 12' range, these other hydropunch samples do not help characterize the horizontal distribution of the plume. Please include more discussion/justification describing how Hydropunch depth-discreet sampling depths were selected, and clearly indicate the limitations of the data presented in characterizing the vertical and horizontal extent of contamination.
- Section 3.2 and Figure 4** – There needs to be further discussion/clarification on why groundwater monitoring wells were screened across entire aquifer thickness, especially considering the results of the Hydropunch investigation, showing that the vertical extent of the contamination at the center of the plume may be limited to the 9.5' to 12' range. Include discussion of how the dilution within groundwater monitoring wells may under-represent contaminant concentrations in the aquifer. Please elaborate on low flow sampling techniques used and clarify if EPA sampling procedures for low flow groundwater sampling¹ were followed. Also, please discuss how zones of higher contamination identified in the Hydropunch investigation were targeted.

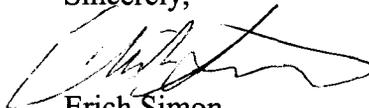
¹ Puls, Robert W. and Barcelona, Michael J., EPA/540/S-95/504 (April 1996), *Low Flow (Minimal Drawdown) Groundwater Sampling Procedures*

- 2 -

3. **Figure 4** – Please include non-detect results on this figure, especially for well 26MW03. These results are needed to demonstrate that 1,2-DCE in groundwater monitoring well 26MW03 was non-detect, whereas 1,2-DCE in the Hydropunch boring immediately adjacent to this well (B20-SB-001) at the 9.5' to 12' depth was 310 ug/L. This discrepancy needs to be addressed in the Section 4.3 of the text.
4. **General** – Clearly indicate on all figures and tables what the results in **bold** font indicated.

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

Sincerely,



Erich Simon
Project Manager

CC (via US Mail and email):

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