

Alameda Reuse and Redevelopment Authority

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Governing Body

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May 26, 2006

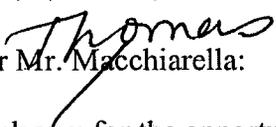
Marie Gilmore
Councilmember/Community
Improvement Commissioner
City of Alameda

Mr. Thomas L. Macchiarella
BRAC Environmental Coordinator
Navy BRAC Program Management Office
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Tony Daysog
Councilmember/Community
Improvement Commissioner
City of Alameda

Frank Matarrese
Councilmember/Community
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Re: Comments on April 2006 *Former NAS Alameda, Operable Unit 1, IR Sites 6, 7, 8, and 16, U.S. Navy Announces Proposed Plan*


Dear Mr. Macchiarella:

Doug deHaan
Councilmember/Community
Improvement Commissioner
City of Alameda

Thank you for the opportunity to comment on the Navy's April 2006 *Former NAS Alameda, Operable Unit 1, IR Sites 6, 7, 8, and 16, U.S. Navy Announces Proposed Plan (PP)*. The *PP* is welcome because it reduces some of the uncertainty about the remedial measures that will be required to clean up these OU-1 sites. The Alameda Reuse and Redevelopment Authority (ARRA) offer the following comments.

Debra Kurita
City Manager/
Executive Director

GENERAL COMMENTS

1. The ROD (Record of Decision) for these OU-1 sites must specify the scope of any future investigation to address data gaps. This information should have been provided in the *PP*. Instead, the *PP* defers this issue until after the primary regulatory decision making (the ROD) has occurred.

"The Final RI Report summarizes additional data gaps which were identified by the Navy and the regulatory agencies. These data gaps will be addressed in the remedial design." (p.3, right, bottom)

The *PP* should have clarified the nature of the data gaps and spelled out the scope of an investigation the environmental regulatory agencies will find acceptable. Customarily, investigation to resolve data gaps occurs before decision making about the remedy, but sometimes it is more practical to postpone closing minor data gaps until the remedial design. However, the objective and scope of deferred investigation tasks must be detailed in the ROD, if not sooner.

2. By approving the ROD, the DTSC (California Environmental Protection Agency, Department of Toxic Substances Control) must confirm that

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successful implementation of the ROD will be sufficient remediation to justify closure of the linked RCRA SWMUs (Resource Conservation and Recovery Act solid waste management units). Many SWMUs are located within OU-1 sites, and the sites themselves are SWMUs. As a matter of regulatory efficiency, remedies should be selected in the ROD that will provide a level of cleanup that is acceptable to the DTSC for closure of the coincident SWMUs. The ROD should specifically recognize DTSC's intention in this regard.

3. For Sites 7 and 16, the ROD must specify the issues to be addressed to achieve closure of the RCRA SWMUs. This specification would include discussion of the scope of any further investigation and remediation.

SPECIFIC COMMENTS

1. Site 6 Remedial Investigation and Feasibility Study Summary The ROD must specify the objective and scope of the investigation that will be conducted for Site 6 groundwater during remedial design. The *PP* text is unclear about the nature of future groundwater investigation that will be required at Site 6:

“Based on the results of the RI, further evaluation in an FS was recommended to delineate the chemicals that were detected in groundwater.” (p. 5, right, bottom)

It is even unclear whether the groundwater data gap involves only the lateral extent of the plume, or also its vertical extent. The *PP* should have specified the nature of the data gap and the goal of the future groundwater investigation. For example, the *PP* could have said, “The northwest boundary of the groundwater plume has not been defined yet. Additional investigation will be conducted in the remedial design to delineate the lateral extent of constituents of concern in the northwest quadrant of the plume.”

2. Site 6 Remedial Investigation and Feasibility Study Summary The ROD must specify the objective and scope of the investigation that will be conducted for the Site 6 OWSs (oil-water separators) during remedial design. The *PP* text is unclear about the nature of any future investigation of OWSs that will be required at Site 6:

“...[N]o remedial action for soil is necessary at Site 6 to protect human health, except for additional investigation of potential contamination at the OWSs.” (p. 6, left, bottom)

It is even unclear whether the OWS data gap involves only soil, or also groundwater. The *PP* should have specified the nature of the data gap and the goal of the future OWS investigation. For example, the *PP* could have said, “Additional characterization of the soil and groundwater beneath and directly adjacent to the OWSs will be conducted in the remedial design to identify the nature and extent of constituents of concern that may have been released from the OWSs.”

3. Site 6 Groundwater The ROD must confirm that the selected remedy for Site 6 groundwater will be acceptable to the DTSC for closure of the SWMUs. The *PP* states this intention:

“The planned groundwater remedial action is also intended to close the RCRA SWMUs at Site 6.” (p. 7, right, middle)

The *PP* should have disclosed whether the DTSC concurs with this statement. Even though the DTSC reviews and comments on draft proposed plans, it is unclear whether this is an instance where the Navy and the environmental regulatory agency agree to disagree.

4. Site 7 Remedial Investigation and Feasibility Study Summary The ROD must specify the objectives and scopes of the investigations that will be conducted for the Site 7 debris layer and OWS during remedial design. The *PP* text is unclear about the nature of any future investigations of the debris layer and of the OWS that will be required at Site 7:

“The RI report recommended further evaluation of soil in the debris layer and near OWS-459.” (p. 9, left, bottom and right, top)

The *PP* should have specified the nature of the debris layer data gap and the goal of the future investigation. For example, the *PP* could have said, “Additional characterization of the soil in the X and Y direction and beneath Building 459 will be conducted in the remedial design to identify the nature and extent of constituents of concern in the debris layer.”

The ARRA’s comment regarding the future investigation needed for OWS-459 is the same as Specific Comment 2, above. Specifically, the *PP* should have specified the nature of the data gap and the goal of the future OWS investigation. For example, the *PP* could have said, “Additional characterization of the soil and groundwater beneath and directly adjacent to the OWSs will be conducted in the remedial design to identify the nature and extent of constituents of concern that may have been released from the OWSs.”

5. Site 7, Remedial Alternative 2: Sampling and Excavation with Off-Site Disposal of Soil The ROD must specify the nature of additional actions needed to close RCRA SWMUs at Site 7. The *PP*’s recommended alternative for Site 7 includes the following:

“Additional actions necessary to close the RCRA SWMUs will be identified and addressed in the remedial design.” (p. 10, left, bottom)

The *PP* should have disclosed what remaining issues exist and the steps that will be required by the environmental regulatory agencies in the remedial design to facilitate closure of the RCRA SWMUs at Site 7.

6. Site 8 Remedial Investigation and Feasibility Study Summary The ROD must confirm that the selected remedy for Site 8 soil will be acceptable to the DTSC for closure of the SWMUs. The *PP* states this intention:

“Furthermore, the sampling effort and any subsequent remediation activities, at OWS-114 are expected to result in the closure of SWMUs OWS-114 and WD-114.” (*sic*) (p. 12, left, top)

The *PP* should have disclosed whether the DTSC concurs with this statement. Even though the DTSC reviews and comments on draft proposed plans, it is unclear whether this is an instance where the Navy and the environmental regulatory agency agree to disagree.

7. Site 16 Remedial Investigation and Feasibility Study Summary The ROD must specify the objective and scope of the investigations that will be conducted during remedial design for the Site 16 OWSs and for PCBs (polychlorinated biphenyls) in Site 16 soil. The *PP* text is unclear about the nature of any future investigations of the OWSs and PCBs in soil that will be required at Site 16:

“...[n]o remedial action for soil is necessary at Site 16 to protect human health; however, additional information is required at the locations of the OWSs. Additional sampling and possible remediation will be performed at the OWSs. The agencies have requested additional sampling to further characterize PCBs in soil.” (p. 14, left, bottom)

The *PP* should have specified the nature of the soil PCBs data gap and the goal of the future investigation. For example, the *PP* could have made a statement such as “Additional characterization of the soil at X and Y locations will be conducted to evaluate the nature and extent of PCBs in soil.”

The ARRA’s comment regarding the future investigation needed for the OWSs at Site 16 is the same as Specific Comment 2, above, specifically, the *PP* should have specified the nature of the data gap and the goal of the future OWS investigation. For example, the *PP* could have said “Additional characterization of the soil and groundwater beneath and directly adjacent to the OWSs will be conducted in the remedial design to identify the nature and extent of constituents of concern that may have been released from the OWSs.”

8. Site 16 Groundwater, Remedial Alternative 4: Treatment to Remediation Goals with ISCO and Accelerated Bioremediation, MNA, and ICs The ROD must specify the objective and scope of the groundwater investigation that will be conducted for Site 16 during remedial design. The *PP* text is unclear about the nature of any future groundwater investigation that will be required at Site 16:

“Additional plume delineation would be performed in the remedial design.” (p. 15, right, bottom)

The ARRA’s comment regarding future groundwater investigation at Site 16 is the same as Specific Comment 1, above.

9. Site 16 Soil, Remedial Alternative 3: Soil Sampling and Excavation with Off-Site Disposal of Soil The ROD must specify the nature of additional actions needed to close RCRA SWMUs at Site 16. The *PP*’s recommended alternative for Site 16 includes the following:

“Additional actions necessary to close the RCRA SWMUs would be identified and addressed in the remedial design.” (p. 10, left, bottom)

The *PP* should have disclosed what remaining issues exist and what steps will be required by the environmental regulatory agencies in the remedial design to facilitate closure of the RCRA SWMUs at Site 16.

Thank you for considering the ARRA’s comments. If you have any questions or need additional information, please call me or the ARRA’s environmental consultant, Dr. Peter Russell at (415) 492-0540.

Sincerely,



Debbie Potter
Base Reuse & Community Development Manager

DP:sb

cc: Anna-Marie Cook, USEPA
Judy Huang, RWQCB
Dot Lofstrom, DTSC
Peter Russell, Russell Resources, Inc.
Aidan Barry, APCP