



Department of Toxic Substances Control

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March 16, 2007

Mr. Thomas L. Macchiarella, Code BPMOW.TLM
Department of the Navy
Base Realignment and Closure Program
Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310

REVIEW OF DRAFT RECORD OF DECISION, SITE 25 SOIL, ALAMEDA POINT, ALAMEDA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Record of Decision, Site 25 Soil, (ROD), dated December 19, 2006, and has the following comments.

MAJOR COMMENTS

- 1) California Health and Safety Code Section 25232(b) (1) (A)-(E) should be added to the list of State of California applicable or relevant and appropriate requirements (ARAR). This ARAR applies to all areas at Site 25 currently covered by hardscape.
- 2) The description of institutional controls (ICs) on page 12-1, second paragraph, is too general. The text should specify that institutional controls are warranted in two different locations. The first location is impacted soil at depths below four feet. The second location is for the soil beneath existing buildings and hardscape. The paragraph needs to be rewritten so that it is clear that there are two sets of criteria to be met. The Feasibility Study clearly states that there is an applicable IC that applies immediately below ground surface in areas covered with hardscape, but the ROD is never that specific. Please rephrase all descriptions of ICs so that it is clear that the potential contaminant concentration of polynuclear aromatic hydrocarbons (PAHs) under buildings is unknown, and that the prohibition against digging is applied at ground surface.
- 3) The ROD should specifically state that all areas currently covered by hardscape will be restricted against residential and other sensitive uses. The sensitive use prohibition against all areas currently covered by hardscape should be described as a bulleted item in Section 12.1.3 as well as on Table 13-2. The ROD should clearly state that a restriction against residential use for areas currently covered

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by buildings and hardscape will be included in a Land Use Covenant if the property is conveyed to a non-federal entity.

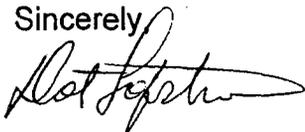
- 4) Please remove the statement on page 7-11 that the ICs in the preferred alternative are a precautionary measure for the majority of the site and not needed to control exposure. DTSC policy is that a remedy resulting in cumulative site risk of less than one in one million (10^{-6}) is acceptable for unrestricted use. Thus, the ICs are, in DTSC's view, a required measure for the site and are indeed necessary to control exposure.

MINOR COMMENTS

- 1) Please avoid the acronym "RMR." This is not a commonly used or understood acronym. Replace with Risk Management Range.
- 2) Page 12-1 – Please rewrite the sentence stating that the Department of the Navy (DON), "has made a risk-management decision that ICs are warranted" in the first sentence of the second paragraph and replace with, "The DON, in coordination with the regulatory agencies and considering the previous TCRA's completed for soil at the site, has concluded that ICs are warranted for impacted soil at depths below four feet at Site 25."
- 3) Page 12-4 states that the ICS shall be maintained until such time as PAH concentrations in soil have been reduced or remediated to levels that allow for unrestricted site use and exposure. This statement is disingenuous, since it is unlikely that PAH concentrations in soils will ever be reduced or remediated to levels that allow for unrestricted site use and exposure. Please rephrase to more accurately depict the situation, that the IC that prohibits digging at depths greater than four feet is likely to remain in place indefinitely and unlikely to ever be revoked.

If you have any questions, please contact me at (916) 255-3732.

Sincerely,



Dot Lofstrom, P.G.
Remedial Project Manager
Office of Military Facilities

cc: See next page.

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