



California Regional Water Quality Control Board

San Francisco Bay Region



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ALAMEDA POINT
SSIC NO. 5090.3

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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: Comments on the Draft Record of Decision for Installation
Restoration Site 27, Alameda Point, Alameda, California**

Dear Mr. Macchiarella:

We have reviewed the above referenced document and have the following comments:

General Comments

1. **General Comment** – Please include a figure that explicitly shows concentrations and extent of COC plume boundaries, based on all available data.

Specific Comments

1. **Figure 1-3** – Please include the boundaries of CAA-11B in this figure titled Site Features.
2. **Section 2.2.1 - Page 2-4 – fourth paragraph down** – This paragraph describes the site investigation for Transfer Parcel EDC-12 that sampled for polyaromatic hydrocarbons (PAHs) in a grid pattern over the entire area but does not summarize the results of this investigation. Please include a brief summary of these results here instead of just referencing the Remedial Investigation data set.
3. **Section 2.2.4 – Page 2-7 – Last paragraph** – This paragraph indicates that washdown area WD-166 and oil water separators OWS-166A and OWS-166B were recommended for no further action under the Total Petroleum Hydrocarbon (TPH) program. As these areas still require further action under the CERCLA program, please clearly indicate in this paragraph that while the TPH program recommended no further action, more investigation under the CERCLA program is planned.
4. **Table 2-1 – Page 1 of 3 – 3rd item down** – The summary of findings for the 2000 and 2001 Storm Drain Investigations indicates that ‘a TPH plume in shallow groundwater was identified at Outfall I’. Please be more specific as to where the TPH plume extends and indicate if this TPH plume is being addressed as a part of Corrective Action Area (CAA)-11B.

5. **Section 5.3 – Nature and Extent of Contamination in Soil, Groundwater, and Soil Gas** - Please include a discussion in this section on any known releases that have occurred at this site, when those releases occurred, and the estimated volume of the release. This information, if available, may help in estimating the age of the plume and associated contaminants.
6. **Section 5.3.2 – Page 5-4 – second paragraph from bottom** – This paragraph describes how elevated arsenic levels are a result of modified geochemical conditions within the central portion of the volatile organic carbon (VOC) plume. Please provide a technical explanation for why arsenic levels are elevated and why it is believed that the localized mobilization of arsenic in soil is expected to return to background levels once remediation is complete.
7. **Section 5.3.3 – Page 5-5 – Last Paragraph** – This paragraph indicates that 2,2,4-Trimethylpentane was reported in all soil gas samples distributed across the site but does not indicate the levels that were detected or if these levels are above any risk-based or toxicity-based levels. Please briefly summarize these results and provide applicable references.
8. **Section 7.1.4 – Page 7-5 – Noncancer Hazards and Lead subsection** – This section identifies that while the majority of the risk in the residential scenario for soil is associated with arsenic, concentrations are within the Alameda Point background levels. Considering that the recommendation of no further action for soil is based on the incremental risk for metals above background levels, please discuss in detail on how arsenic background levels were calculated and reference regulator concurrence with these metals background calculations. Furthermore, please clarify how future residential users across this site will be protected from elevated background levels of arsenic.
9. **Section 8 – Page 8-1 – Third Paragraph** – Please include a reference to the Alameda Point background determination.
10. **Section 9.4 – Page 9-2** – Alternative 6A includes using in-situ chemical oxidation (ISCO) to oxidize VOCs in groundwater in the two areas of higher VOC concentrations. As noted in General Comment #1, please include more detail on where these two areas would have been by referring to a figure showing extent of contaminant plumes.
11. **Section 9.5 – Page 9-2** – Alternative 6B includes confirmation sampling for VOCs as well as monitored natural attenuation (MNA) parameters, but does not include MNA as a component of the alternative. Because the intent of collecting the MNA parameter data is to determine if MNA is feasible if ISCO treatment does not reduce concentrations down to remedial goals, why is MNA not specifically called out in Alternative 6B? MNA is also included in the Remedy Implementation decision matrix in Figure 12-2. Please revise or include further justification for not specifically identifying MNA as a preferred alternative after ISCO treatment.

12. **Section 12 – Page 12-1** – Please include more information on nature and extent of contamination at Area of Concern (AOC) 15 and discuss why this AOC, which is located adjacent to the shore at Seaplane Lagoon, is not specifically addressed in the selected remedy.

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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