



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
Environmental Protection

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Arnold Schwarzenegger
Governor

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ALAMEDA POINT
SSIC NO. 5090.3.A.

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 Operable Unit 5/IR-02 Groundwater, Alameda Point and Alameda Annex, Alameda, California

Dear Mr. Macchiarella:

Upon review of the *Draft Record of Decision for Operable Unit 5/IR-02 Groundwater, Alameda Point and Alameda Annex, Alameda*, dated September 2006 (Draft ROD) we have the following comments:

#	Page	Section	Comments
S1	Figure 1-3		This figure demonstrates that the groundwater plume has not been adequately characterized yet; the benzene and naphthalene plume boundary is not even inferred in the southeast corner of the plume, near the College of Alameda. Include a discussion of the groundwater data collected southwest of the site and also near the College of Alameda, and include what data gaps currently exist. Also, the plume description in this figure does not indicate which contaminants are represented. Please include this information in the legend.
S2	5-4	5.3	Nature and Extent of Contamination in Groundwater – second bullet list – are the compounds listed here include all those that the groundwater monitoring program tested for, those that were above screening levels, or those that were detected at OU-5/IR-02. Please specify.
S3	6-2	6.2.1	Third Paragraph – This paragraph indicates that the USEPA considers the FWBZ under the central region of Alameda Point to not be a drinking water source, but does not discuss the Water Board's position regarding this matter which is stated in the 6/9/99 letter sent by us. This letter indicates that we also concur with the Navy that the shallow water at the Alameda Annex is not a potential source of drinking water.

#	Page	Section	Comments
S4	10-2	10.4	Reduction of Toxicity, Mobility, or Volume – This paragraph suggests that natural degradation of petroleum would produce only harmless end products (CO ₂ and water). While the chemical oxidation of petroleum products would result in the formation of some CO ₂ and water, incomplete breakdown products that are resistant to oxidation would also result, some of which would not be harmless. Please be clear that not only CO ₂ and water would be the result of the accelerated degradation proposed in alternatives 3 and 4.
S5	12-7	12.4.3	Institutional Controls at Former DON Property at FISCA – We are referred to incorrectly in this sentence. Please revise ‘Regional Water Control Board’. Throughout the document, please refer to us as either the San Francisco Bay Water Board or just Water Board.
S6	13-8	13.2.1.2	State Drinking Water Standards – While the Water Board identified the shallow groundwater below Alameda Annex to not be a potential drinking water source (Water Board Letter to DON 6/9/99), we have not provided concurrence with the Navy’s determination that groundwater in the central portion of Alameda Point is not a potential drinking water source. Because of this, we feel that state MCL’s are applicable for groundwater below OU-5. Please revise document to reflect our position, including pages 13-10 and 13-11.

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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