



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721

AR_NO0236_003101
ALAMEDA POINT
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

July 1, 2005

Mr. Thomas L. Macchiarella
Southwest Division Naval Facilities Engineering Command
Attn: Code 06CA.TM
1220 Pacific Highway
San Diego, CA 92132-5190

DRAFT FINAL FEASIBILITY STUDY REPORT, IR SITE 17, SEAPLANE LAGOON, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the above referenced document dated May 2005 and the Responses to Comments (RTCs) on the November 2004 Draft Feasibility Study (FS). We concur with the San Francisco Bay Regional Water Quality Control Board (Water Board) that the Draft Final FS is incomplete. We further concur that the project should move forward to the Record of Decision (ROD) stage provided the issues outlined in the attached memorandum are adequately addressed prior to the design and construction phase.

For any future submittal of draft final documents, DTSC requests that the RTC on the draft report be distributed and discussed with the agencies prior to issuing the draft final document. Please contact me at 510-540-3767 or mliao@dtsc.ca.gov if you have any questions.

Sincerely,

Marcia Liao
Remedial Project Manager
Office of Military Facilities

Attachment

Mr. Thomas L. Macchiarella
Page 2
July 1, 2005

cc: Greg Lorton, SWDiv
Darren Newton, SWDiv,
Mark Ripperda, EPA
Judy Huang, RWQCB
Charlie Huang, DFG
Robert Wilson, DHS
Elizabeth Johnson, City of Alameda
Peter Russel, Northgate Environmental
Jean Sweeney, RAB Co-Chair
Lea Loizos, Arc Ecology

**MEMORANDUM
REMAINING CONCERNS
DRAFT FINAL FEASIBILITY STUDY REPORT
IR SITE 17 SEAPLANE LAGOON
ALAMEDA POINT, ALAMEDA, CALIFORNIA**

Part I: Concerns of the Office of Military Facilities (OMF)

1. The potential on-shore sources of contamination at the Seaplane Lagoon (SPL) include storm sewers, groundwater discharges from OU-2B and, possibly, IR Site 27. The FS states that no remedial activities will be undertaken at SPL until it has been confirmed that all potential sources of contamination are isolated from the lagoon. Please clarify when and how such confirmation will take place.
2. Please clarify how the construction debris pile, if found contaminated, will be remediated. The debris pile is currently being investigated as part of the Offshore Sediment Study,
3. The SPL is bordered on the southeast side by Pier 1. The sediment at south side of Pier 1 is currently being investigated as part of the Offshore Sediment Study for the potential release of creosote from wood piling. Pending on the results, evaluation of the sediment at the north side of Pier 1, i.e. the southeastern corner of the SPL, may be warranted.

Part II: Concerns of the Human and Ecological Risk Division (HERD)

Please refer to the attached HERD memorandum dated June 28, 2005.



Department of Toxic Substances Control



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA

1011 North Grandview Avenue
Glendale, California 91201



Arnold Schwarzenegger
Governor

MEMORANDUM

TO: Marcia Liao, DTSC Project Manager
OMF Berkeley Office
700 Heinz Street, Second Floor
Berkeley, CA 94704

FROM: James M. Polisini, Ph.D.
Staff Toxicologist, HERD
1011 North Grandview Avenue
Glendale, CA 91201

DATE: June 28, 2005

SUBJECT: DRAFT FINAL FEASIBILITY STUDY SEAPLANE LAGOON,
NAVAL AIR STATION ALAMEDA (ALAMEDA POINT)
[SITE 201209-18 PCA 18040 H:8]

BACKGROUND

HERD reviewed the document titled *Draft Final Feasibility Study Report Seaplane Lagoon, Alameda Point, California* dated 27 May 2005. This document was prepared by Batelle, Inc. of Duxbury, Massachusetts. The review of this Draft Final Feasibility Study (FS) is in response to your work request transmitted via electronic mail on June 8, 2005.

The Seaplane Lagoon (SPL) is located in the southeastern corner of Alameda Point with Piers 1, 2 and 3 located outside the SPL southern boundary. The 110 acres SPL was constructed in an area originally occupied by a tidal flat and was dredged to a depth of approximately 20 feet. The current depth is approximately 10 feet to 20 feet. The lagoon is enclosed by land on the north, east and west sides and bounded by a breakwater on the south. From the 1940s to 1975 SPL was a point of discharge for some of NAS Alameda's storm-sewer outfalls. Industrial wastewater generated at NAS Alameda was discharged directly to the storm drains which subsequently discharged to the SPL and other offshore areas, including the Oakland Inner Harbor. The SPL received approximately 300 million gallons of wastewater from industrial and storm water outfalls over the 35 years of discharge. The SPL also received potentially hazardous materials from spills that were washed into the industrial waste or storm

water collection system as well as discharges from docked ships at nearby pier areas. In 1975, the industrial discharge to the SPL ceased. The SPL now has a storm water pollution prevention program in place to ensure that only surface water is carried through the storm drain system and discharged to the SPL. Under the Community Reuse Plan for Alameda Point, the proposed future use of SPL includes development of a commercial marina including deep draft yacht facilities.

NAS Alameda was an active naval facility from 1940 to 1997. Operations included aircraft, engine, gun and avionics maintenance; fueling activities; and metal plating, stripping and painting.

GENERAL COMMENTS

HERD reviewed the Response to Comments (RTC) (Appendix F, pages F-28 through F-33) which address comments made in the February 2, 2005 HERD memorandum reviewing the Draft FS Report. Sections of the revised text, referenced in the RTC, were checked and found to be amended. Responses to other agency comments, referenced in response to HERD comments, were also checked and found to adequately address the HERD technical issue. The majority of technical issues raised in the February 2, 2005 HERD review of the Draft FS for the SPL are adequately addressed. There remain several issues which will become important during 'refinement' of the area of sediment to be remediated. These issues are listed as Specific Comments below.

SPECIFIC COMMENTS

1. HERD Specific Comment number 12: HERD deferred to the U.S. EPA Region 9 regarding enforcement of the Clean Water Act (CWA) Ambient Water Quality Criteria (AWQC) for areas of the SPL where pore water samples, and potentially surface water, exceed the AWQC. The EPA comments and the RTC to these EPA comments, appear to contain no reference to the CWA AWQC as an Applicable or Relevant and Appropriate Requirement (ARARs).
2. HERD Specific Comment number 17: HERD could not locate the revisions to the text which the Navy indicates in the RTC were made and reference site-specific SPL studies of cadmium efflux. In fact the section originally cited (Section 3.2.1.1, page 34) specifically states that 'contaminants of concern at IR Site 17 indicate that they tend to adhere to sediment particles rather than dissolve into the water column'. The Navy has demonstrated that a net cadmium efflux from sediments to overlying water occurs in the SPL without the requirement of disturbances such as dredging. Net efflux of cadmium from the sediments should be considered when 'refining' the remediation footprint, and may be linked to the response above regarding the CWA and AWQC.

3. HERD Specific Comment number 24: The acknowledgment response does not state whether the 200 µg/kg polychlorinated biphenyl (PCB) sediment criterion, based on the Total Maximum Daily Load (TMDL) work of the San Francisco Regional Water Quality Control Board (SFRWQCB), will be implemented as a not-to-exceed or volume-averaged criterion. The RTC to EPA Specific Comment number 16 (Appendix F, page F-6) indicates that the Navy has developed an area-weighted average comparison for sediments in the upper two feet and upper 4 feet of in-place SPL sediment (Section 3.0, page Table 3-4 and 3-4, page 63). Representatives of the SFRWQCB indicated verbally, in recent telephone discussions with HERD, that the 200 µg/l PCB concentration should be implemented as a not-to-exceed criterion in the Northwest and Northeast corners of the SPL. Continued coordination with the SFRWQCB will be required on this issue.

CONCLUSIONS

 HERD has no technical objection to the RTC and the associated changes in the text, tables and figures of the document.

HERD accepts the cadmium sediment PRG of 24.4 mg/kg for the SPL, as a site-specific value, based on the calculation of mass reduction due to remedial action, which is still to be verified, the low incidence of benthic bioassay adverse effects and consideration of post-remedial action monitoring of SPL surface water cadmium concentrations at the sediment-water interface. This sediment cadmium concentration should not be used without site-specific verification and discussion with HERD at any other Navy site.

The Navy proposes refinement of the SPL footprint (RTC EPA comment 20) during the design-stage, construction-stage and long term sampling and monitoring stages. HERD anticipates continued interaction with the Navy during this footprint reassessment and monitoring program design.

HERD Internal Review: Michael Anderson, Ph.D.
Staff Toxicologist

cc: Sophia Serda, Ph.D.
U.S. EPA Region IX (SFD-8-B)
75 Hawthorne Street
San Francisco, CA 94105

Ned Black, Ph.D., BTAG Member
U.S. EPA Region IX (SFD-8-B)
75 Hawthorne Street
San Francisco, CA 94105

Marcia Liao
June 28, 2005
Page 4

Ms. Beckye Stanton, BTAG Member
California Department of Fish and Game
1700 K Street, Room 250
Sacramento, CA 94244-2090

Charlie Huang, Ph.D., BTAG Member
California Department of Fish and Game
1700 K Street, Room 250
Sacramento, CA 94244-2090

Laurie Sullivan, M.S., BTAG Member
National Oceanic and Atmospheric Administration
c/o U. S. EPA Region 9 (H-1-2)
75 Hawthorne Street
San Francisco, CA 94105-3901

Naomi Feger, BTAG Member
Judy Huang, BTAG Member
San Francisco Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Voice 818-551-2853
Facsimile 818-551-2841
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