

**RESPONSE TO COMMENTS FOR  
 DCN: ECSD-2201-0015-0004 DRAFT SUMMARY OF FINDINGS EXPLORATORY TRENCHES  
 INSTALLATION RESTORATION SITE 1  
 FORMER NAVAL AIR STATION ALAMEDA  
 ALAMEDA POINT, ALAMEDA, CALIFORNIA  
 (DATED OCTOBER 19, 2007)**

Reviewed by James M. Polisini, Ph.D., Staff Toxicologist, HERD  
 Comments Dated: March 26, 2008

COMMENTS	RESPONSE
<p><b>Comment 1.</b> The date of the kick-off meeting (Section 2.2, page 2-2) and the staking of the trench endpoints (Section 2.3, page 2-2) are summarized without description of the method(s) used to site the trenches. Seven former disposal cells are believed to lie within the IR Site 1 landfill (Section 2.4, page 2-2). Trench 5 was excavated below the concrete of the pistol firing range (Appendix B, CD-ROM, page 11 of 38). A description of the method(s) used to site the location of the 11 excavation trenches must be included in the report</p>	<p><b>Response 1:</b> Locations were sited based on rough field determination using the figure. As described in the Work Plan and reported in the Summary of Findings Report, the end of each trench was surveyed by Coast Surveying. We will add the following explanation at the beginning of Section 2.3:          “The trench locations were sited based on rough field determination utilizing the trench location figure from the Work Plan (included here as Figure 1-1). Physical site features were used to determine a rough approximation of field location in accordance with the figure.”</p>
<p><b>Comment 2.</b> There are no pictures of the excavation of trench number 9. The sequence of trench pictures proceeds from trench 8, to trench 11 and then to trench 10 (Appendix B, CD-ROM). Please include any pictures from the trench 9 excavation in Appendix B).</p>	<p><b>Response 2:</b> No pictures were taken of trench 9 due to the fact that the site camera malfunctioned that day. We will correct the sequencing of the trench pictures to go in the order of trench 8, trench 10, and trench 11. We will add a note to the summary table under T-9 that no pictures were acquired due to camera malfunction.</p>
<p><b>Comment 3.</b> There appear to be discrepancies among the excavation summary (Table 2-1), the information in the trench logs (Appendix A) and the captions provided with the pictures</p>	<p><b>Response 3:</b> No response required. See detailed comments below.</p>

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(Appendix B, CD-ROM only). The following apparent discrepancies should be corrected or explained

**Trench 2:** The barrel alone (i.e., 'carcass') of a drum, missing the top and bottom was excavated. This is indicated in the trench log (Appendix A) and picture caption (Appendix B, page 3 of 38) but the summary (Table 2-1) indicates 'no drums'. As one goal of the excavation was to locate any buried drums, the drum remnant should be indicated in the summary table

**Response:** The drum carcass was not mentioned in the summary table because the table was prepared to briefly summarize the findings from the trench log, not to repeat the information that was included in the trench log. It should be noted that all trench excavations were performed in an area that is a known landfill. Due to this, a variety of landfill type debris was encountered; however, it was not an objective of this work effort to document in detail all debris that was encountered.

**Trench 3:** An 'old rubber fuel cell' was apparently removed according to a picture caption (Appendix B, CD-ROM, page 7 of 38). The summary table (Table 2-1) should be amended to include this information

**Response:** In the summary table we mention that wood, metal, and rubber debris was encountered. It should be noted that all trench excavations were performed in an area that is a known landfill. Due to this, a variety of landfill type debris was encountered; however, it was not an objective of this work effort to document in detail all debris that was encountered.

**Trench 4:** A pipeline was uncovered according to the trench log (Appendix A) without being documented in a picture (Appendix B, CD-ROM, page 4 of 38). The summary table (Table 2-1) does not describe a pipeline. Please amend the summary table

**Response:** The summary table will be amended to include a mention of the pipeline that was uncovered in the trench. The pipeline is drawn and referred to in the "Profile of Trench" section of the trench log.

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**Trench 6:** There appears to be a white small-diameter pipeline in several of the excavation pictures (Appendix B, CD-ROM, page 12 of 38 and page 18 of 38). Please add this pipeline to the summary table (Table 2-1) or if it is part of the excavation set-up amend the picture captions accordingly

**Response:** The summary table will be amended to include a mention of the pipeline that was uncovered in the trench..

**Trench 10:** An abandoned pipeline was excavated at the bottom of the trench according to a picture caption (Appendix B, CD-ROM, page 36 of 38). Neither the summary table (Table 2-1) nor the trench logs mention this pipeline. Please amend the summary table to note the abandoned pipeline

**Response:** The summary table will be amended to note the abandoned pipeline.

**Trench 11:** A fairly significant size of concrete debris with reinforcing rod (rebar) was excavated from the trench according to a picture caption (Appendix B, CD-ROM, page 26 of 38) but neither the trench log (Appendix A) nor the summary table (Table 2-1) indicate this item. Please amend the summary table to include the concrete debris

**Response:** The summary table will be amended to indicate that concrete debris with rebar was encountered and unearthed.

**Comment 4.** The majority of the trenches are aligned north-to-south (9 of 11) while two trenches are aligned east-to-west (Appendix A trench logs). Please provide the rationale for orientation of the excavation trenches in the text

**Response 4:** Orientation was based on accessibility issues or a field decision at the time of work. The text will be updated to indicate this.

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**Comment 5.** While limitations in the radiological characterization of the excavated material would, as stated in the text, argue against a strict application of the percentage of excavations with radiological findings across the entire site (Section 3.0, page 3-2) it cannot be argued that the prevalence of radiological material across the site is less than that determined in these excavations. HERD recommends that both sides of the uncertainty in extrapolations of radiological findings based on limited trenching be presented in the text

**Response 5:** Section 3.0 has been edited from: "Of the total volume excavated, approximately 25 percent was estimated to be potentially radiologically impacted based on conservative characterization methods previously described. However, given the limited capabilities of using only field NaI instrumentation to segregate potentially radiologically impacted from non-impacted materials, it should not be inferred that the distribution of radiological contamination in the excavations is consistent throughout the volume that was considered radiologically impacted, nor should it be inferred that this distribution would be consistent throughout the entire site." The word "conservative" will be removed. See below.

The text will now state:

"Of the total volume excavated, approximately 25 percent was estimated to be potentially radiologically impacted based on characterization methods previously described. However, given the limited capabilities of using only field NaI instrumentation to segregate potentially radiologically impacted from nonimpacted materials, it should not be inferred that the distribution of radiological contamination in the excavations is consistent throughout the volume that was considered radiologically impacted, nor should it be inferred that this distribution would be consistent throughout the entire site. The actual percentage of

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	<p>radiologically contaminated soil cannot be determined because it was not possible to test all the soil at the site.”</p> <p>Note: The word “consistent” was chosen so as not to reflect bias in the uncertainty of these findings.</p>
<p><b>Conclusions.</b> The excavation report should be amended as outlined above to: 1) provide a more complete description of the rationale for trench location; 2) to complete the photographic record of the excavation; 3) to correct discrepancies in the presentation of excavation results; and, 4) to provide a balanced presentation of the uncertainty in extrapolating the limited excavation results to the entirety of IR Site 1</p>	<p><b>Response:</b> The report will be revised in accordance with the Response to Comments provided above.</p>



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DATE: 05/16/08

CTO: 0015

LOCATION: Alameda, CA

FROM:

[Handwritten signature]

A. N. Bolt, Program Manager

DESCRIPTION: Response to Comments for DCN: ECSD-2200-0015-0004
Draft Summary of Findings Exploratory Trenches

Installation Restoration Site 1, Former Naval Air Station Alameda (Dated October 19, 2007)

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