



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

February 21, 2014

Ms. Mary Parker  
Department of the Navy  
Base Realignment and Closure  
Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310

**Subject: Draft Proposed Plan for Alameda Point Operable Unit 5/ FISCA IR-02  
Groundwater, Alameda, CA, January 2014**

Dear Ms. Parker:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document and has the following attached comments. Please feel free to contact me at (415) 972-3149 for further clarification.

Sincerely,

A handwritten signature in blue ink that reads "John Chesnutt" with a small "for" written below it.

Chris Lichens  
Remedial Project Manager  
Federal Facilities and Site Cleanup Branch  
US EPA, Region IX

cc: Bill McGinnis, BRAC PMO, West  
James Fyfe, DTSC  
Peter Russell, Russell Resources, Inc.  
John West, RWQCB

Derek Robinson, BEC  
John Chesnutt, EPA  
Bob Carr, EPA

**EPA Review of the Draft Proposed Plan for Alameda Point Operable Unit 5/ FISCA IR-02 Groundwater, Alameda, California, January 2014**

**GENERAL COMMENTS**

1. The Proposed Plan should provide a more detailed description of the current remedy, the results of its operation, and the basis for the proposal to discontinue treatment. For example, the mass of contamination removed from the groundwater should be provided and discussed in the context of the vapor intrusion (VI) risk. In other words, the risk has been reduced by virtue of removing contaminant mass from the groundwater.
2. Before finalizing the Proposed Plan as a No Action remedy, the BCT should discuss whether Institutional Controls (ICs) to limit VI in future developments and/or periodic monitoring to ensure that the risk associated with vapor intrusion continues to be acceptable remain prudent to continue. EPA agrees that the October 2013 sampling data do not currently reflect an unacceptable vapor intrusion risk from groundwater. However, future development of the site could create preferential pathways for contaminant migration. The Proposed Plan should acknowledge the potential for contaminant "rebound" and diffusion into shallow groundwater within the treatment area which could result in increased potential for vapor intrusion. In addition, the PP should describe the areas with elevated benzene and naphthalene concentrations (e.g., north and northwest of Kollman Circle in the vicinity of PC 2-1 and P181-MW46, where concentrations of benzene and naphthalene increased) that were outside the footprint of the groundwater treatment area. As part of this discussion the BCT should consider whether existing vapor intrusion engineering controls should remain in place and what role the Marsh Crust Ordinance should play.
3. VI sampling is typically done at least twice: once in the summer (i.e., to evaluate the effect of air conditioning on VI) and once in the winter (i.e., to evaluate the effect of heating on VI) and in multiple buildings. Although EPA is not recommending additional sampling at this time, ICs with periodic monitoring should be considered at least through the first Five Year Review. Finally, the samples collected at Island High School and the Woodstock Child Development Center may not be representative of conditions across the entire plume (e.g., north and northwest of Kollman Circle as discussed above), or represent the potential for VI into residential buildings.
4. The Proposed Plan should briefly discuss information from the Navy's presentation during the March 14, 2013 Restoration Advisory Board (RAB) meeting, including the conclusions from that presentation. During the presentation, the Navy indicated that the vapor intrusion risk was low, but also that there is some uncertainty regarding the risk. Input from the community during the follow up question and answer period should also be summarized in the Proposed Plan.