

**RESPONSE TO COMMENTS
JUNE 13, 1997**

**RESPONSE TO AGENCY COMMENTS
ON DRAFT TIME-CRITICAL REMOVAL ACTION MEMORANDUM,
SANDBLAST GRIT AREAS (IR-02)
NAVAL FUEL DEPOT POINT MOLATE**

This document presents the Navy's responses to comments from the California Environmental Protection Agency Department of Toxic Substances Control (DTSC) and the U.S. Environmental Protection Agency (EPA) on the Navy Fuel Depot (NFD) Point Molate Site 2 draft time-critical removal action memorandum, dated May 7, 1997.

RESPONSE TO COMMENTS FROM DTSC DATED MAY 20, 1997

DTSC comments involved items the Department regarded as missing from the action memorandum.

SPECIFIC COMMENTS

Comment 1: Transmittal letters from the Navy indicating if one or both of these documents (the draft removal action memorandum and the draft removal action field workplan) is intended to serve as the equivalent of a removal action workplan.

Response: The removal action memorandum and the field work plan transmittal letter have been revised as follows: the removal action memorandum and the field work plan are provided to assist you in meeting State requirements.

Comment 2: Detailed engineering plan missing from the removal action memorandum; if this is represented by the field work plan, please clarify.

Response: Pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 Code of Federal Regulations (CFR) Part 300, Section 415, and EPA Office of Emergency and Remedial Response, action memorandum guidance, Office of Solid Waste and Emergency Response (OSWER) Directive 9360.3-01, an engineering evaluation and cost analysis (EE/CA) is required only for non-time-critical removal actions. In addition, the simple nature of this removal action does not warrant development of a detailed engineering plan.

Comment 3: Goals to be achieved by the removal action (if this is represented by the field work plan, please clarify).

Response: Section 1.0 of the removal action memorandum indicates that the time-critical removal action will eliminate unacceptable risk associated with metals in sandblast grit at Site 2. Section 4.1.2 also indicates that the removal action will further reduce the potential risk to human health associated with metals contamination in shallow soil.

Comment 4: Alternative removal options considered and rejected and the basis for that rejection. Other technologies may include posting warning signs and fencing the site, capping, and control of stormwater run-on and runoff.

Response: Section 4.1.3 has been revised as follows: No engineering evaluation or cost analysis (EE/CA) for alternative technologies has been completed because the nature and goals of the removal action are straightforward. In addition, no EE/CA is required for time-critical removal actions.

The sandblast grit is present on soil and concrete and in brush. Removal of the sandblast grit requires vacuuming concrete surfaces and clearing brush, and removal and off-site disposal of sandblast grit piles. This removal action also facilitates early property reuse. Fencing and posting signs or capping the grit would prohibit early property reuse.

Comment 5: Complete discussion of applicable or relevant and appropriate requirements (ARARs). Please refer to the enclosed ARARs table.

Response: Based on Navy counsel's review of the DTSC ARARs table, Applicable or Relevant and Appropriate Requirements, Section 4.1.4, has been revised to include the following two state ARARs: (1) Identification and Listing of Hazardous Wastes: 22 California Code of Regulations (CCR), Chapter 30 and (2) Standards Applicable to Generators of Hazardous Wastes: 22 CCR, Chapter 12.

Comment 6: Quality Assurance Project Plan, describing the policy, organization, functional activities, and data quality objectives and measures necessary to achieve adequate data for use in planning and documenting the proposed removal action.

Response: Quality Assurance/Quality Control (QA/QC) measures specific to Site 2 are addressed in Section 5.3 of the Field Work Plan.

Comment 7: Health and Safety Plan or reference to an existing plan (may need to be modified to address procedures and/or potential contaminants).

Response: For sampling activities described in the field work plan, PRC Environmental Management, Inc. (PRC) will adhere to the NFD Point Molate basewide health and safety plan (PRC 1996). For the removal action, Morrison Knudson (MK) will follow the health and safety plan specific to the proposed removal activities at Site 2.

Comment 8: Role of the restoration advisory board with respect to mandated public involvement (e.g., presentation of the proposed removal action to the restoration advisory board for comment.)

Response: Section 6.0 indicates that the Navy will place a public notice of the proposed removal action in a local newspaper and will inform the community that the NFD Point Molate administrative record is available for review. The Navy has also provided copies of the draft time-critical removal action memorandum to all five members of the technical review committee, and will also distribute to the technical review committee, copies of the final time-critical removal action memorandum. There are no additional public involvement requirements for time-critical removal actions with respect to the restoration advisory board.

Comment 8: Complete the administrative record, including recent meeting minutes and correspondence.

Response: The administrative record has been revised to include Base Closure Team (BCT) and Remedial Project Manager (RPM) meeting minutes and correspondence from the regulatory agencies regarding the Site 2 removal action.

RESPONSE TO COMMENTS FROM EPA DATED MAY 22, 1997

SPECIFIC COMMENTS

Comment 1: Section 2.1.5, National Priorities List Status. Please revise text to indicate that Pt. Molate has been preliminarily scored as part of the Preliminary Assessment/Site Inspection (PA/SI) and is a low priority, active Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) site.

Response: Although NFD Point Molate was preliminarily scored on a preliminary basis as part of the PA/SI, the purpose of Section 2.1.5 is to identify whether NFD Point Molate is on the National Priorities List.

Comment 2: Appendix A, Administrative Record List Applicable to Site 2 Removal Action. Please include minutes from the March 24, 1997, BRAC [Base Realignment and Closure] Cleanup Team (BCT) and Remedial Project Managers (RPM) meeting and all correspondence transmitted by regulatory agencies for IR Site 02 removal action in the Administrative Record List.

Response: The administrative record has been revised to include BCT and RPM meeting minutes and correspondence from the regulatory agencies regarding the Site 2 removal action.

Comment 3: Appendix B, Risk Screening, Table 6, PRG Screening Evaluation, Residential and Occupational Exposure Scenarios. Please check calculated risk ratio for carcinogenic chemicals under residential and occupational exposure scenarios.

Response: The calculated risk ratio for carcinogenic chemicals under residential and occupational scenarios has been reviewed and is accurate.