



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

N30519_000278
NFD POINT MOLATE
SSIC NO. 5090.3.A

5090
Ser 06CM.MS/0181
February 15, 2001

Ms. Adriana Constantinescu
Project Manager
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Ms. Constantinescu:

Subject: RESPONSE TO COMMENTS ON THE DRAFT SITE 1 ACTION
MEMORANDUM, NAVAL FUEL DEPOT POINT MOLATE

Enclosed is the Response to Comments on the Site 1 Draft Action Memorandum for NFD Point Molate. This document has also been provided to Ms. Rebecca Ng of Contra Costa County, Mr. Michael Wochnick of the California Integrated Waste Management Board (CIWMB), and Mr. Kent Kitchingman of the City of Richmond. Resolution of these comments is to be conducted at a working meeting the week of March 5, 2001. Please contact Ms. Michelle Gallice Sondrup at (619) 532-0971, if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Faiq Aljabi".

FAIQ ALJABI

Environmental Baseline Team Leader
By direction of the Commander

Encl: (1) Response to Comments on the Draft Site 1 Action Memorandum, Naval Fuel Depot (NFD), Point Molate

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Copy to:

Mr. Kent Kitchingman (1 copy)
City of Richmond
330 25th Street
Richmond, CA 94804

Mr. Michael Wochnick (1 copy)
CIWMB
1001 I Street
PO Box 4025
Sacramento, CA 95812

Ms. Rebecca Ng (1 copy)
Contra Costa Environmental Health
2120 Diamond Blvd.
Suite 200
Concord, CA 94520

Ellen Miller (letter only)
Tetra Tech EM Inc.
1099 18th Street
Suite 1960
Denver, CO 80202

Brian Schuller (letter only)
Tetra Tech EM Inc.
4940 Pearl East Circle, Suite 100
Boulder, CO 80301

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Blind copy to:
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Site1-AMResponsetoComments FEB 13, 01

EPA
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[Signature]

**RESPONSES TO REGULATORY AGENCY AND CITY OF RICHMOND COMMENTS
ON THE DRAFT SITE 1 ACTION MEMORANDUM
NAVAL FUEL DEPOT (NFD) POINT MOLATE**

This document is the Navy's response to comments on the Draft Site 1 Action Memorandum for Naval Fuel Depot (NFD) Point Molate, dated December 11, 2000. Comments were received from Ms. Linda Dorn of the Regional Water Quality Control Board, San Francisco Bay Region (RWQCB), in a letter dated December 28, 2000, and from Mr. Kent Kitchingman from the City of Richmond via electronic mail on January 2, 2001. Ms. Rebecca Ng of Contra Costa Health Services (CCHS), the local enforcement agency (LEA), responded in an electronic mail dated January 26, 2001, that she had no comments. Mr. Michael Wochnick of the California Integrated Waste Management Board (CIWMB) responded in a letter dated January 2, 2001, that he also had no comments and no objection to the selected alternative.

RESPONSES TO RWQCB COMMENTS

Comment 1: Section 2.4, Release or Threatened Release Into the Environment of Hazardous Substances or Pollutants or Contaminants: Do surface seep water concentrations exceed action levels proposed in the Draft Fuel Product Action Level Development (FPALDR) report? Please include the evaluation of surface water seep concentrations to action levels to determine whether an unacceptable risk to ecological receptors exists. A complete exposure pathway to groundwater does exist as surface water seeps, and is noted in the conceptual model in the FPALDR.

Response: **Consistent with the approach used for groundwater, action levels for surface water are currently being developed in the Fuel Product Action Level Development Report (FPALDR) under the UST program for NFD Point Molate. Action levels will be compared with post-closure surface water data for Site 1 to evaluate whether contaminant concentrations are acceptable or whether corrective action is needed. This comparison should be made with post-closure data because of recent actions taken under the UST program that are intended to reduce the contaminant source in the area. In addition, implementation of the selected alternative at Site 1 will change the flow of surface water. The evaluation of surface water will be documented in the Record of Decision for Site 1.**

Comment 2: Section 2.6.1, State and Local Actions to Date: On December 13, 2000, the RWQCB prepared and submitted to the Office of Planning and Research, State Clearing House, a Notice of Exemption, based on Title 14 California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act (CEQA), Article 19 Categorical Exemptions, Section 15330 Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances.

Response: **A summary of this information will be included in the Final Action Memorandum.**

Comment 3: Section 5.0, Action and Estimated Costs, Institutional Controls: Under Notification of Transfer, the City of Richmond Planning Department should be notified in addition to the RWQCB, Navy, and Local Enforcement Agency (LEA), because the planning department ultimately approves any plans for development of Point Molate.

Response: The document will be modified to include the City of Richmond Planning Department under Notification of Transfer.

Comment 4: Section 5.3, Description of alternative Technologies: The estimated cost for alternative 2 on page 19 does not match the cost of alternative 2 in section 5.6.

Response: Costs in Section 5.3 were used in the engineering evaluation and cost analysis (EE/CA) to provide comparative costs among the alternatives. The cost for implementation of Alternative 2 in Section 5.6 includes administrative costs that help the Navy plan for funding. Language will be added to Section 5.6 to indicate that administrative costs have been added to the base cost estimated in the EE/CA.

Comment 5: Section 5.4.2, SWRCB Regulations: The Final Engineering Evaluation/Corrective Action, Action Memorandum, Design Package, and Record of Decision fulfill the requirements for a closure plan. Waste Discharge Requirements may be developed in the future based on the documents mentioned above.

Response: This information will be summarized in Section 5.4.2.

RESPONSES TO CITY OF RICHMOND COMMENTS

Comment 1: Page ES-2, Paragraph 1: States the groundwater "corrective action" will be determined in a record of decision (ROD). Briefly clarify why this action calls for groundwater containment and monitoring, but no decision on groundwater cleanup. This comment also applies to page 2, paragraph 2.

Response: The selected alternative includes groundwater monitoring, but not containment. The selected alternative prevents exposure to the waste and the groundwater. Monitoring is being conducted to comply with applicable or relevant and appropriate requirements (ARARs) and collect data to compare with future action levels that are being developed in the FPALDR. No decision was made regarding groundwater cleanup because the action levels are still being developed. The document will be changed to clarify how the action addresses groundwater.

Comment 2: Page ES-2, Paragraph 3, Last sentence: I would eliminate everything after landfill (its redundant - see above sentence) and replace with "and this would simplify the risk assessment process."

Response: To eliminate the redundancy, the phrase "and that a risk assessment would be conducted after the action was complete" will be deleted.

- Comment 3: Pager ES-2, last paragraph: States this proposed action “reduces mobility, toxicity or volume through treatment”. Clarify how this remedy qualifies as a treatment. (This comment also applies to Section 5.3, page 19, paragraph 1 and page 20, last paragraph).
- Response:** The words “through treatment” will be deleted from the referenced sentences.
- Comment 4: Section 1.0, page 2, paragraph 1: At end of second sentence I would add “although the final decision will be made in a future Site 1 ROD.”
- Response:** The words “and the final decision will be documented in a ROD” will be added to the referenced sentence.
- Comment 5: Section 1.0, page 2, paragraph 2: After last sentence add “therefore no groundwater cleanup is included in this action; however, groundwater exposure pathway elimination and monitoring are part of this action.”
- Response:** The suggested language will be included before the last sentence as “however, groundwater monitoring and elimination of exposure pathways are part of this action.”
- Comment 6: Section 2.2.1, page 5, paragraph 3: Last sentence referring to “migrating sources” should be changed to “contamination migrating from sources...”.
- Response:** The recommended change will be made.
- Comment 7: Section 2.3, page 6, paragraph 1: Sentence with “removal action had been selected” should add “and implemented”.
- Response:** The suggested language will be added.
- Comment 8: Section 3.0, page 11: Bullet 4 of the PA summary refers to no risk of explosion. What about >5% methane?
- Response:** Methane concentrations are still being monitored to evaluate whether venting is necessary. Although the risk of explosion is not driving the action, this potential will be identified in Section 3.0.
- Comment 9: Section 5.1, page 15: “Vegetative cover” should discuss whether trees could be planted.
- Response:** There are no plans to include trees as part of the vegetative cover at this time.
- Comment 10: Section 5.1: Should the last sentence be in a different category such as “Other”?
- Response:** The last paragraph of Section 5.1 discusses mechanisms to implement institutional controls. This paragraph will be moved to the introduction of institutional controls.

Comment 11: Section 5.2, page 18: First sentence should add “however, a ROD is needed to document the final action or no action decision.”

Response: The sentence, “The final decision will be documented in a ROD,” will be included in this section.

Comment 12: Section 5.3, page 19: Last paragraph should explain why reduced infiltration will not prevent groundwater contamination.

Response: Although a low-permeability cap would reduce infiltration to groundwater, it would be unnecessary because the waste is located below the water table and is already saturated. This information will be added to the referenced section.

Comment 13: Section 5.3, page 20: Last sentence should be reworded to state “this alternative is superior in meeting all the criteria, which consist of

Response: The sentence was worded as is because Alternative 2 is not superior in all respects. This language is also consistent with the Final Engineering Evaluation and Cost Analysis for Site 1.

Comment 14: Section 5.4.1, page 24, paragraph 1: Should provide a citation for the statement that NEPA [National Environmental Policy Act] and CEQA [California Environmental Quality Act] requirements are no more stringent than CERCLA [Comprehensive Environmental Response, Compensation, and Liability Act]/NEPA.

Response: This citation is from the Southwest Division Naval Facilities Engineering Command’s draft guidance on ARARs. This citation will be included in the Final Action Memorandum.

Comment 15: Section 5.4.3, page 28: Paragraphs 1 and 2 aren’t clear if the ARAR for landfill gas monitoring will be waived or met by this action.

Response: This ARAR is met by the selected alternative. Title 27 California Code of Regulations (CCR) 20921(d) allows for a reduction in monitoring based on results. A reference to Title 27 CCR Section 20921(d) will be included in the referenced paragraphs.

Comment 16: Section 5.4.4, page 28: Second sentence states the “Navy will impose environmental restrictions” instead of “land use restrictions.”

Response: The referenced statement will be changed to “land use restrictions.”

Comment 17: Section 7.0, page 29, paragraph 2: Change to “periodical distributed in Western Contra Costa County”.

Response: The referenced change will be made.

Comment 18: Table 2, first row under “Landfill Capping”: I don’t recall this being discussed in the text, and I found it confusing. How does this impact other Title 27 ARARs?

Response: Title 27 CCR Section 20090(d) requires the Navy to follow Title 27 to the extent feasible. The ARARs analysis in the Draft Action Memorandum identifies the feasible requirements of Title 27 CCR for the selected alternative.

ENCLOSURE

DRAFT

SITE 1 ACTION MEMORANDUM

DATED 11 DECEMBER 2000

THIS RECORD IS ENTERED IN THE DATABASE AND FILED AS

RECORD NO. N30519_000268