



California Regional Water Quality Control Board

San Francisco Bay Region



Dr. Alan Lloyd
Secretary for
Environmental -
Protection

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Arnold Schwarzenegger
Governor

N30519_000430
NFD POINT MOLATE
SSIC NO. 5090.3.A

Date **MAR 03 2005**
File No. 2119.1057 (AVC)

Base Realignment and Closure
Program Management Office West
Attn: Mr. Michel Bloom
BRAC Environmental Coordinator
1230 Columbia Street, Suite 1100
San Diego, CA 92101

SUBJECT: Comments on the Draft Record of Decision for Installation Restoration Site 1, Naval Fuel Depot Point Molate, Richmond, California

Dear Mr. Bloom:

Thank you for your December 2004 "Draft Record of Decision (ROD) for Installation Restoration Site 1, Naval Fuel Depot Point Molate, Richmond, California", received by the San Francisco Bay Regional Water Quality Control Board (Water Board) on December 15, 2004. This documents presents the selected remedy for remediation at Site 1 at Point Molate to be completed by the U.S. Department of the Navy (Navy). The selected remedy includes continued maintenance and monitoring of the former landfill, institutional controls and engineering controls.

Water Board's staff had thoroughly reviewed the above document and specific comments are presented below:

1. **Section 1.4 Selected Remedy:** This section does not include the following components as outlined in the EPA guidance ("A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents", 1999): a description of how the action fits into the overall site management plan (given that Site 1 is one of the 4 sites at NFD Point Molate, the intended sequence and timing of the remedial actions at Point Molate, and the identification of the selected performance standard.
2. **Section 1.6 Record of Decision Certification Checklist:** In the certification checklist please include page numbers indicating where the listed information can be found in the ROD to become a "road map" to key information, as suggested in the EPA guidance.
3. **Authorizing Signature, page 3:** Please include the middle initial H. on the name of the executive officer. Please delete the rank II after the name of the executive officer.

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4. Section 2.1.2: *Lead and Support Agencies*: Please add that the Navy is the lead agency for this ROD and for the cleanup at NFD Point Molate.
5. Section 2.2 *Site History and Enforcement Activities*: The statement “no enforcement activities have been conducted at NFD Point Molate” is not accurate. Water Board issued enforcement documents as Site Cleanup Requirements Order #97-124 and Time Schedule Order #97-125.
6. Section 2.3 *Site Characterization*: On page 7, on the first paragraph describing the engineering control at NFD Point Molate Site 1, please include the Groundwater monitoring wells used to assess the up-gradient/down gradient groundwater and leachate quality.
7. Section 2.6.1.4 *OWS Effluent*: On the table presenting the OWS effluent sampling results, please present on a separate column the action levels for the constituents of concern.
8. Section 2.8.2 *Summary of Alternative 2*: On page 15, on the last paragraph of this section, please clarify what method will be used to provide notice of the institutional control at the site to the future owners.
9. Section 2.11.3 *Five Year Review Requirements*: For clarification, please add that the CCR Title 27 criteria will also be considered in the evaluation of post-closure groundwater monitoring frequency.

If you have any questions, please contact Mr. Adriana Constantinescu at (510) 622-2353, or via e-mail at AConstantinescu@waterboards.ca.gov.

Sincerely,



Adriana Constantinescu, PG
Project Manager for Point Molate

cc: Mr. Craig Murray, City of Richmond
Mr. Don Gosney, RAB Co-Chair

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