



# California Regional Water Quality Control Board

## San Francisco Bay Region



Winston H. Hickox  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov>  
1515 Clay Street, Suite 1400, Oakland, California 94612  
Phone (510) 622-2300 FAX (510) 622-2460

N00236.000064  
ALAMEDA POINT  
SSIC NO. 5090.3

Gray Davis  
Governor

Date: January 26, 2001  
File No.: 2199.9285 (LBJ)

mem 2/6/01  
Rick \_\_\_\_\_

Mr. Mike McClelland, BEC  
U.S. Navy  
EFD Southwest  
1220 Pacific Hwy  
San Diego, CA 92132-5190

**Subject : Comments on Draft Final Operable Unit 3 Remedial Investigation Report Addendum, Volume 1, Alameda Point, Alameda, California**

Dear Mr. McClelland:

Regional Board staff have reviewed the document titled *Draft Final Operable Unit 3 Remedial Investigation Report Addendum, Volume 1, Alameda Point, Alameda, California* dated December 13, 2000. In general, the document is well written and succeeds in addressing many of the outstanding issues surrounding the OU-3 landfill. While we generally concur with the proposed plan of action to address data gaps for OU-3, we believe that, at this time, it is appropriate to reiterate one of the Regional Board's appropriate, relevant and applicable requirements (ARARs) for OU-3 as it pertains to the Navy's interpretation of the data.

While we appreciate the Navy's interpretation of ambient water quality criteria and dilution factors, the San Francisco Bay Basin Plan establishes an enforceable numeric standard of 15 µg/l for total polycyclic aromatic hydrocarbons (PAHs) in bay waters. We interpret this criterion to be an ARAR for the site and applicable to the interstitial water in sediment immediately offshore of sample HP-S01-B3. The available data do not provide sufficient basis to conclude that the Basin Plan limit has been met at this location at this site.

Upon inspection of the data in the *Data Summary Memorandum, Breakwater Beach and Western Bayside Offshore Areas, Alameda Point, California* we could not identify data that refute the possibility of an ongoing groundwater impact to the Bay from the OU-3 landfill. Sample WB001, the offshore sample located nearest HP-S01-B3, was not analyzed for PAHs. Deeper intervals from sample B02 located farther offshore of sample WB001 contained detectable, but unquantifiable concentrations of low molecular weight PAHs, possibly indicating an ongoing groundwater impact from the landfill. Our equilibrium calculations based on the sediment sample detection limits indicate that the Basin Plan limit for dissolved PAHs may, in fact, be exceeded in this sample location.

It is also important to note the numerous detections of PAHs throughout the Western Bayside Offshore Area adjacent to OU-3. In our opinion, the presence of elevated toxicity and PAHs in Bay sediment in the Western Bayside Offshore Area constitutes an impairment of the beneficial

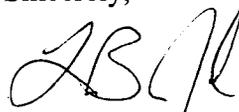
Mr. Mike McClelland  
Page 2 of 3

uses of San Francisco Bay and as a potential source of the pollution, the groundwater underlying OU-3 impairs or threatens to impair the beneficial uses of San Francisco Bay.

While we believe that it is unlikely that dissolved phase transport from OU-3 is responsible for all of the PAHs observed in offshore sediments, it is the Navy's responsibility to determine the extent to which OU-3 groundwater is contributing to PAHs in Bay sediment/pore water and thenceforth into Bay biota. To this end, we believe that the proposed approach will address some of the uncertainty about the potential for ongoing migration of pollution from the OU-3 landfill to the bay, but that one or more permanent monitoring wells should be installed outboard of HP-S01-B3 to better quantify the potential impact of OU-3 on the Bay. Of course, as with all landfills, long-term stewardship and monitoring will be required for the foreseeable future.

Our concerns and recommendations regarding the elevated concentrations of PAHs in offshore sediments will be addressed in forthcoming comments on the offshore data summary memorandum. We look forward to completion of the OU-3 Remedial Investigation and appreciate the efforts of the individuals involved in this project. Should you have any questions, please contact me at (510)-622-2400.

Sincerely,



Brad Job, P.E.  
Water Resources Control Engineer

cc:  
Steve Edde, BRAC Environmental Liaison  
Naval Air Station, Alameda  
Navy Transition Office  
950 Mall Square, Room 245  
Alameda, California 94501

Mr. Michael Bloom  
EFD Southwest  
1220 Pacific Hwy  
San Diego, CA 92132-5190

Anna Marie Cook  
Federal Facilities Cleanup Branch  
U.S. Environmental Protection Agency Region IX  
75 Hawthorne Street, (SFD-8-2)  
San Francisco, California 94105

Mr. Mike McClelland  
Page 3 of 3

Phillip Ramsey  
Federal Facilities Cleanup Branch  
U.S. Environmental Protection Agency Region IX  
75 Hawthorne Street, (SFD-8-2)  
San Francisco, California 94105

Mary Rose Cassa, R.G.  
California Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721

Elizabeth Johnson  
Alameda Reuse and Redevelopment Authority  
950 West Mall Square  
Alameda, California 94501