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May 19, 1994

LT Mike Petouhoff
Environmental Officer, Alameda Naval Air Station
Code 015, Room 209
Alameda, CA 94501-5000

**Subject: Comments on the Engineering Evaluation and Cost Analysis for the Site 15
Removal Action, CLEAN Contract # N62474-88-K-5086**

Dear LT Petouhoff:

As the Chair of the East Bay Military Base Conversion Task Force chartered by the Sierra Club's San Francisco Bay Chapter, I am writing to express our support for the interim remedial action you have chosen for Site 15 at the Alameda Naval Air Station (ANAS).

The removal action proposed for this site, located along the Oakland estuary on the northern edge of the air field at ANAS, will reduce the amount of lead and PCB contaminated soil blowing into the San Francisco Bay. The proposed removal action, a combination of solvent extraction and acid washing, will allow the soil to be reused on site as fill and is an environmentally attractive alternative. The experience gained in implementing this innovative removal action promises to encourage others to select treat and reuse alternatives instead of the traditional haul and dump alternatives.

We agree, as you carefully pointed out in the Engineering Evaluation and Cost Alternative Report (EECAR), that this is an interim action. Interim actions are guided by interim cleanup standards and are intended to involve actions costing less than 2 million dollars. Below, we emphasize the interim nature of the cleanup standards and explain the conditions under which it may be advantageous to consider temporarily capping the site, an alternative that may speed reuse of other sites and allow other environmental hazards to be addressed earlier. The closing sections of this letter proposes several additions to the EECAR that would both facilitate coordination of cleanup and reuse plans and increase community acceptance of interim actions.

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Cleanup Standards are Interim, Not Final

The proposed cleanup standards are reasonably protective for an interim action at this small, isolated, and little-used site. These levels may, however, be unsuitable for a final remedial action. Should the recent and surprising discovery of elevated levels of PCBs in fish collected in the North Bay turn out to be caused by PCB contaminated soil blowing into the Bay, the 1 mg/kg cleanup level for soil may need to be lowered for a final action. We are also concerned that recent epidemiological studies in urban areas with lead tainted soils suggest that lead levels much lower than 130 mg/kg are required to protect the health of children. A recreation area accessible to children is one possible future use for this site.

Cost - How Much for an Isolated Site?

As the design for the removal action is refined, the cost of the proposed alternative may increase beyond the estimate in the EECAR to a level that is unreasonable for an interim action at an isolated site. The EECAR notes that the normal budget limit for interim actions conforming to guidelines in the Comprehensive Environmental Cleanup and Liability Act (CERCLA) is 2 million dollars. Pre-design estimates in the EECAR place the cost of this alternative well over this limit, at almost 2.5 million dollars. The estimated cost of this single action for a site that is unlikely to be a significant part of any short term reuse plan amounts to almost 10% of the entire environmental budget in the Base Cleanup Plan (BCP) for fiscal years 94 and 95 combined. If the cost of implementing this alternative rises substantially, other alternatives should be reconsidered. Cost estimates for this alternative involving solvent extraction and acid washing should be significantly more reliable after results of laboratory treatment studies become available.

Initial cost estimates for new processes are frequently too low and the proposed action includes two new processes, solvent extraction and soil washing. The EECAR cost estimate also omitted the cost of required treatability studies and of off-site disposal of treatment residuals. With two new processes, the cost of treatability studies could be significant, over \$100,000. The treatability studies may also show that the treatment process may generate a significant volume of residuals that will have to be disposed of off-site, at significant additional cost.

Alternative funding may be available to help defray the cost of demonstrating this innovative treatment and on-site reuse of soil, but application procedures for these funds would probably delay implementation. The U.S. EPA SITE program, a technology demonstration program, is one example of an alternative funding source.

Should costs of the solvent extraction and soil washing alternative escalate, I believe that capping of the site should be considered in addition to the interim removal alternatives described in the

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EECAR. A temporary cap, such as asphalt for a parking lot, would stop the wind-borne spread of PCB contaminated soil and further slow leaching of PCBs and lead from the soil into the groundwater beneath the site. A cap would reduce leaching by stopping the percolation of rainwater through the soil.

Capping may become the preferred interim action if costs of the selected solvent extraction and soil washing alternative escalate significantly. Selection of capping would then make substantial funding available earlier to other high priority sites. Other high priority sites include those that would be more likely to be a significant part of a short term reuse plan or that are sources of toxic compounds that are migrating off-site. Examples of such sites include soil containing heavy metals outside of metal plating shops and the landfills that are leaching toxic metals and chemicals into the San Francisco Bay.

Although it may be difficult to justify the proposed removal action at this time solely on the basis of immediate cost-effectiveness for the ANAS, this removal action is also an investment in the Navy's future. If successful, this innovative approach to on-site management of soil containing lead and PCBs promises to reduce the Navy's exposure to future liabilities at off-site disposal facilities. Reduction of future liabilities is a significant advantage in this era of the doctrine of joint and several liability. This legal doctrine makes the Navy potentially responsible for all remedial expenses at any facility where it deposits Navy wastes, even if the Navy contributed only an insignificant fraction of the waste. Any reduction in the amount of waste shipped off-site reduces the Navy's exposure.

Provide More Background Information in EECARs and Feasibility Studies

As emphasized in the above section on cleanup costs, costs of interim actions must be considered within the context of the cleanup plan for the entire air station. Therefore the cost analysis should include a brief summary of the environmental cleanup budget for the entire facility and an explanation of why a particular site is being chosen for interim action before other sites.

The cost analysis should discuss the benefits of an interim action as well as its monetary cost. The analysis should address the following questions:

- 1) How will the action reduce environmental risks?
- 2) How will the action increase the value of the land?

Since this is an interim action, the discussion of these questions need not be extensively documented. In many cases a simple relative ranking with other sites that could be considered for interim actions would suffice. There are many community and government organizations in the San Francisco Bay Area with both interest and expertise in environmental and land use

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planning that would help with a relative ranking. The East Bay Conversion and Reinvestment Commission can supply general guidance for developing ranking criteria. The Reuse Authority for ANAS, the City of Alameda's Base Reuse Advisory Group, and your own Restoration Advisory Board can assist with actual ranking of the sites.

The inclusion in the EECAR of several readily available pieces of information and graphical aids would assist with the coordination of the remedial action and reuse plans. These include 1) a comparison of the cost per acre or square foot of cleaning up the property with the prevailing value of industrial, commercial, and residential real estate in the area; and 2) the inclusion of graphical schedules for implementation of both the interim action and the land use plan. Concerns about tentative schedules raising false expectations among the local community could be addressed by carefully explaining the assumptions upon which the schedules are based. Careful explanation of these assumptions would be invaluable for protecting the Navy's credibility whether or not graphical schedules are included.

Suggestions for Improving Community Acceptance

Besides providing interim action and land use as discussed in the previous section, the Navy can add several other items of information to EECARs and Feasibility Studies to increase community acceptance of remedial actions, such as that proposed for Site 15. Each planning document, either in an attached cover letter or preferably in the document itself, should describe how the document and its parts, such as the executive summary, will be distributed and who has been asked to serve as reviewers. A clear explanation of the document distribution will enable reviewers to assure the Navy that all interested parties have been notified about the document and will facilitate coordination between reviewers.

Another suggestion for improving community acceptance is specific to actions involving reuse of soil on site. Since the public is more concerned about soil returned to a site in their neighborhood than soil sent to a landfill, it may be worth the additional cost to sample treated soil returned to a site more frequently than that sent to a landfill. I suggest that you increase sampling frequency for this reused soil to the equivalent of 1 sample per dump truck (~ 1 for every 16 cubic yards). One sample for every dump truck is more reassuring than one sample for every 6 dump trucks (~ 1 for every 100 cubic yards). The extra cost could be offset by increasing to 6 the number of samples per composite actually analyzed. The \$10,000 this additional sampling would cost is a relatively inexpensive insurance policy for a 2 million dollar project. Similarly, post excavation sampling of the area outside of the excavation, as well the excavation's side walls and base, would reassure the public that all contaminated soil had been removed.

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Summary

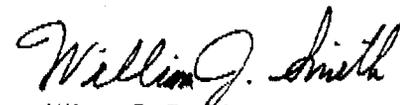
The Sierra Club's East Bay Military Conversion Task Force applauds the Navy for selecting an alternative that will allow contaminated soil to be treated and managed at the Naval Air Station. We have already begun to explain this selection to our members through Sierra Club Committees and plan to include the planned interim action for Site 15 in a future issue of the *Yodeler*, the newsletter for our more than 35,000 local members. We are willing and able to assist you with many of the suggestions described above and summarized here:

- 1) inclusion of a summary of the Base Cleanup Plan (BCP) budget in all EECARs and feasibility studies,
- 2) inclusion of both interim action and land use planning schedules in cost analysis reports and feasibility studies,
- 3) development of comparative rankings between sites for potential risk reduction and for potential future reuse value, and
- 4) cost comparisons, including a comparison of costs per acre or square foot for an interim action with land values for industrial, commercial, and residential uses.

Please contact me at (510)522-0390 to discuss any of the issues raised in this letter or to discuss ways that the Sierra Club can assist with publicity for the removal action at Site 15.

I'll close by thanking the entire Base Closure Team, including James Ricks of the U.S. EPA, Tom Lanphar of the California EPA, and yourself for all that you have done to make remedial planning for ANAS an inclusive and iterative process. Your regular attendance at evening community meetings and faxes direct to community members such as myself are appreciated.

Sincerely,



William J. Smith
Chair, East Bay Military Base
Conversion Task Force

cc: Jim Levine, EBCRC
Nancy Nadel, EBCRC
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