

**NAVAL AIR STATION ALAMEDA RESTORATION ADVISORY BOARD
MEETING SUMMARY**

**NAS Alameda Combined Officers Quarters
NAS Alameda, California**

Tuesday, January 7, 1997

ATTENDEES

See the attached list.

MEETING SUMMARY

I. Introduction and Minutes

Ardella Dailey, the restoration advisory board (RAB) community co-chair, called the meeting to order at 7:07 p.m. Ms. Dailey asked for comments on the December 3, 1996, RAB meeting summary. No revisions were requested and the minutes were approved.

II. Co-Chair Announcements

Steve Edde, the Navy co-chair, made several announcements.

- Mr. Edde gave a brief update on the underground storage tank (UST) soil piles. He said the piles were scheduled to be moved but that a burrowing owl was discovered at the intended new location. He said that another location had been identified, the contract is being let this week, and the soil piles should be moved before the next RAB meeting.
- Mr. Edde distributed a draft installation restoration program (IRP) site status summary (see list of handouts). He said that the summary will be updated monthly until it is fine tuned, and then it will be updated quarterly. He asked the RAB to provide comments on the draft summary.
- Mr. Edde announced that Hans Petersen, the Naval Air Station (NAS) Alameda Environmental Office Community Relations Director, has submitted his resignation. He said that Mr. Petersen has taken a position with the U.S. Environmental Protection Agency (EPA) in Philadelphia and his last day will be January 17, 1997. Mr. Edde thanked Mr. Petersen for his contributions at Naval Air Station (NAS) Alameda and he wished him luck in his new position.
- Ms. Dailey asked Mr. Edde to explain what was covered in the IRP site status summary. Mr. Edde explained that the summary was originally created as part of the Base Realignment and Closure (BRAC) Cleanup Plan (BCP) but has been revised to include information helpful to the RAB including operable unit (OU) and environmental baseline survey (EBS) parcel designations. The RAB briefly discussed issues presented in the site summary. As a result of discussion regarding the public review and comment periods represented in the site summary, Karen Hack formally requested a 60-day

comment period for all draft documents. Mr. Edde said he would find out if Ms. Hack's request could be honored and would make an announcement at the next RAB meeting. Tom Lanphar stated that the review period is usually 60 days for the remedial investigation (RI) report and feasibility study (FS). Dr. Sophia Serda asked if the omission of the EPA from the reference to determining background was intentional (last page by asterisk). It was acknowledged that the omission was an error. Mr. Lanphar said that the BRAC Cleanup Team (BCT) is considering realigning the OUs as proposed by the Navy.

III. Membership Process Action Team

Lyn Stirewalt gave a brief update on the efforts of the membership process action team (PAT). She said that Mr. Petersen sent a cover letter and applications to current members for them to distribute to people interested in becoming a RAB member. She said that the PAT had received 8-10 applications as well as expressed interest from several other people; January 15, 1997 is the deadline for submitting applications. She said the PAT has updated the matrix for screening applicants. The article soliciting new RAB members written by Karen King was published in the utilities newsletter, *Flash*. The PAT's next meeting will be at 7:00 p.m. on Thursday, January 9, 1997 in the RAB library. The applicant screening meeting will be at 7:00 p.m. on Tuesday, January 28, 1997 in the RAB library. She said that the PAT intends to plan an "applicant night" at which time RAB members can meet and interact with applicants. An orientation for new members will be held in February.

IV. RAB Meeting Procedures

Ms. Dailey said that she was willing to serve as an interim community co-chair and in doing so thought it necessary to discuss how the RAB meetings are conducted. She stated she wanted to discuss the following:

- Keeping the meeting on time
- Relevant agenda topics
- Involving the larger community
- Spending time wisely
- Streamlining
- Assigning a time-keeper
- Providing written PAT reports for routine updates; verbal reports when RAB discussions are necessary
- Selecting a new meeting place

Mr. Petersen stated the Combined Bachelors Quarter would not be available after February 1997.

Ms. Dailey explained that she wanted the RAB to discuss changing the date of the meetings because the city council meetings and the board of education meetings are held on alternating Tuesdays. She said that she wanted the RAB to set a protocol for non-RAB guests to address the RAB about issues that may or may not be included on the meeting agenda.

There was a brief discussion about having a RAB facilitator. Mr. Petersen stated that the community relations contract has been let and so there is a funding source for securing a facilitator if the RAB decides one is needed. Mr. Petersen also pointed out that a written survey administered to the RAB indicated that 75 percent of the RAB members do not want a facilitator. Ms. Stirewalt and Ms. Hack agreed to look into services the new community relations contract will provide for the RAB.

Ms. Dailey suggested that the RAB consider conducting RAB meetings at an off-base location. Jeannine Nader agreed and added that the meetings should be held in the west end of Alameda. The RAB briefly discussed possible meeting locations. Ms. Dailey said that if a school is reserved for the meetings it will be at no cost and she can ensure access on school holidays. Mr. Lanphar expressed concern about acoustics if a gym or cafeteria is used. Ms. Dailey said she would look into securing a location for the RAB meetings remaining this year.

The RAB briefly discussed the possibility of changing the RAB meeting dates. Doug deHaan and Bert Morgan said they thought changing the date would confuse the community and would not be productive. Ms. Hack stated that she thinks the date should be changed so that it is not in conflict with the city council meeting. She said that a significant portion of the community and city government is being excluded from participating in the RAB meetings. Ms. Dailey called for a vote and the RAB agreed to continuing the RAB meetings on the current schedule.

Ms. Dailey asked the RAB to create a protocol for the general community to address the RAB at monthly meetings. The RAB agreed that such a protocol should be created. The RAB agreed to having a permanent agenda item so that the community can address the RAB.

Ms. Dailey and several other RAB members expressed concern that the meeting was behind schedule and the BRAC Cleanup Plan (BCP) and the tiered screening methodology still needed to be discussed. James Ricks requested a short break so the BCT could discuss the agenda. After the break, Ms. Dailey announced that the tiered screening methodology is an important issue that requires time for an in depth discussion. Because the meeting was running so late, the BCT will wait until the February meeting to present the issue. There was brief discussion about how the RAB can give the BCT feedback on the tiered screening methodology before a final decision is made and Mr. Edde agreed to get clarification on the process.

V. Site 15 and Soil Piles Options

Ms. Dailey introduced Ms. Hack, who gave an update on the Soil Piles PAT. Ms. Hack distributed copies of the draft Community Acceptance Criteria (CAC) developed by the PAT (see list of handouts). She said the PAT developed the criteria to help empower the RAB and community. She explained that under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), one of the nine criteria in selecting a cleanup remedy is community acceptance. She said the CAC was developed to address not just the final remedy, but to be used when appropriate throughout the process. She asked the RAB to review the CAC and provide her with comments.

Ms. Hack asked the RAB to pay particular attention to Criteria 3, 4, 7, and 12. Ms. Hack asked the RAB to consider the following when reviewing the CAC.

- NAS Alameda is essentially a Superfund site, although it is not referred to as such because of politics.
- The Navy is the lead agency and the responsible party and this is a problem.
- The Navy has not included the community enough throughout the process so far.

Ms. Hack introduced community member Patrick Lynch. Mr. Lynch explained that the PAT has not completed Attachment B of the CAC regarding what is acceptable for placement into a corrective action management unit (CAMU). He said that the PAT agrees that a CAMU should not be a final remedy and the Navy should continue to fund research for new cleanup technologies. After the presentation by Ms. Hack and Mr. Lynch, the RAB asked questions and made comments including the following.

- Tom Okey stated that he thought the CAC was an exciting project and one of the best things the RAB has initiated. He said it is an opportunity for the RAB to take responsibility for what it has learned and to act in the interest of the greater community. He said it is not necessary for the RAB to agree with the BCT; if the risk assessment indicates a certain cleanup level that the BCT agrees on, the RAB can request a stricter cleanup level. He continued that human health risk assessment is a crude tool, although it is more effective than ecological risk assessment. There is little known about the synergistic effects of contaminants and new literature in the risk assessment field is "blowing apart" assumptions about toxicology. In the future we are sure to find out the limitations of our current knowledge and what we find out will scare us, he said. For these reasons, we should insist that the Navy property is cleaned to match the condition it was in when the Navy acquired the land.
- Ms. Stirewalt said that the CAC was a good start and the RAB should give the PAT feedback on the draft. She said that the CAC could provide a common agreement to be used by the RAB in advising the BCT.
- Dr. Serda said that she has a Ph.D. in toxicology and does not agree with Mr. Okey's statements about risk assessment. She said she does think, however, that the CAC contains useful criteria.
- Mr. Lanphar said he thinks the CAC is a good document which helps identify several controversial issues that need to be addressed. He said that these are some of the issues that may be addressed using the tools that will be presented at the Reuse Cooperative Solutions Workshop on January 25, 1997 (see list of handouts). He encouraged RAB members to attend the workshop.
- Ms. Dailey asked the RAB to review the CAC and consider whether the RAB as a whole should be in support of a specific set of criteria. She stated that the CAC will continue to be discussed at future RAB meetings.

VI. BRAC Cleanup Plan

Mr. Edde gave a brief presentation on the draft BCP. He announced that Teresa Bernhard would hold a meeting at 7:00 p.m. on Tuesday, January 21, 1997 in the RAB library to discuss the BCP. He reminded the RAB that all comments on the BCP are due January 29, 1997. He said that the BCP includes an updated map on the findings of suitability to lease (FOSL). Mr. Edde said that he and Mr. Lanphar could field questions about the BCP as a whole. The RAB asked questions and made comments including the following.

- Michelle Kortyna announced to the RAB that she would coordinate a meeting for community RAB members to discuss the BCP prior to the January 21, 1997 meeting with Ms. Bernhard. She stated that she would reserve a table at Lyon's Restaurant for 10:00 a.m. on Saturday, January 11, 1997. She asked interested RAB members to call her.
- Mr. deHaan asked about guidelines for creating a BCP. Mr. Lanphar stated that in 1993 specific guidance for creating a BCP was issued. He said that since then, BCTs are allowed to use a different format when creating the BCP as result of feedback. Mr. Edde added that the guidance still requires certain things to be included in the BCP.
- Mr. deHaan said that the BCP does not contain any long-term timelines. He asked if budgeting and scheduling information will be included in the final BCP. Mr. Edde said that there are many complex issues affecting schedule changes. Mr. Lanphar said the purpose of the first BCP was to create a vision of what to do and since then the BCT has achieved a lot. He continued that the BCT is now looking at how to analyze data and will next be considering how to do cleanup.
- Ken O'Donoghue asked if the schedules will be updated and included in the final BCP. Mr. Lanphar said that the BCP is not final until March 1997 and the BCT is continuing to work on the schedules. He said that as soon as the BCT has updated schedules they will be given to the RAB.
- Ms. Hack requested that the fiscal year 1997 budget be included in the BCP. Mr. Edde stated that the budget will not be available by March 1997 and he is unaware of any changes since he presented the proposed budget to the RAB.
- Ms. Hack said that the BCT would attend a partnering workshop the following week and she requested that the community co-chair or other community RAB member representative be allowed to attend the meeting. Mr. Edde explained that he had taken the request to the Navy. He said that the workshop is internal only and community members will not be allowed to attend. He explained that the workshop was to help the communication and partnering efforts among the members of the BCT and the remedial project managers (RPM). Mr. Edde introduced Bonita Banducci and John Moran, who will be facilitating the workshop. Ms. Hack asked when the RAB can be part of the process. Mr. Edde said that it may be possible to conduct another workshop for the BCT and the RAB. He said that the BCT is always available individually to answer questions and discuss concerns. Ms. Dailey expressed concern that the RAB will be excluded from

the partnering workshop and stated that she wondered who makes the decisions regarding what meetings are open to the RAB.

- Ms. Dailey asked if there was anyone from the general community who wanted to make comment. A community member said that she was disgusted that the discussion of meeting and RAB procedures was not completed years ago, so that the important issue of the tiered screening approach could have been discussed at tonight's meeting.

The meeting was adjourned at 9:45 p.m.

The next meeting will be held at 7:00 p.m. on Tuesday, February 4, 1997, at the Combined Officers Quarters, NAS Alameda.

HANDOUTS:

1. Draft IR Program Site Status Summary
2. Community Acceptance Criteria
3. Reuse Cooperative Solutions Workshop information
4. Department of Toxic Substances Control letter to Engineering Field Activities West (EFA West)
5. EPA letter to EFA West
6. Draft Navy response letter to regulatory agencies regarding tiered screening methodology

** Copies of handouts are on file in the IR Library as part of the official RAB Minutes file. Mailout copies are available on request by calling Julie Brown at (510) 263-3706.*

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NAVAL COMPLEX ALAMEDA
INSTALLATION RESTORATION PROGRAM (IRP) SITE STATUS SUMMARY

Sheet 1 of 6

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IRP Site Number	OU #	Environmental Baseline Survey Parcel #	Site Name/Description	Materials Disposed of, and/or Substance(s) Potentially Released	Status	Public Review & Comment, Estimated Date and Duration*	Current Events/Actions	Public Review & Comment, Estimated Date and Duration
1	3	1, 2, 5	1943 - 1956 Disposal Area (landfill)	Industrial and nonindustrial wastes; including kitchen scraps & garbage from ships in port, cables, scrap metal, waste oil & solvents, paint, construction debris & low-level radiological materials.	RI/FS	Draft RI: 10/27/97 (30 days) Draft FS: 7/24/98 (30 days) PP & Public Meeting 10/22/98 (75 days) Final ROD 3/6/99	Treatability Study, Univ. Waterloo, "funnel & gate"	Draft Report 8/1/97
2	3	5, 7	West Beach Landfill	Industrial and nonindustrial wastes; including municipal garbage, waste chemical drums, waste oil & solvent, plating wastes, paints, scrap metal, low-level radiological materials, pesticides, infectious wastes, inert ordnance, tear gas agents, creosote, waste medicines and reagents.	RI/FS	Draft RI: 10/27/97 (30 days) Draft FS: 7/24/98 (30 days) PP & Public Meeting 10/22/98 (75 days) Final ROD 3/6/99		
3	1	131	Area 97 - Abandoned Fuel Storage Area	AVGAS - high octane aviation gasoline.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98	UC Berkeley Intrinsic Bioremediation Assessment	Draft Final Report 6/4/97
4	2	143	Building 360 - Plating, Engine Cleaning, Paint, and Paint Stripping Shops	Industrial and nonindustrial wastes; including plating shop wastes, waste oil & solvents, metals.	RI/FS	Draft RI: 10/26/97 (30 days) Draft FS: 5/17/98 (30 days) PP & Public Meeting 8/15/98 (60 days) Final ROD 12/27/98	UC Berkeley Chlorinated Solvent Study	Draft Report 5/1/97

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NAVAL COMPLEX ALAMEDA
INSTALLATION RESTORATION PROGRAM (IRP) SITE STATUS SUMMARY

Sheet 2 of 6

IRP Site Number	OU #	Environmental Baseline Survey Parcel #	Site Name/Description	Materials Disposed of and/or Substance(s) Potentially Released	Status	Public Review & Comment; Estimated Date and Duration*	Current Events/Actions	Public Review & Comment; Estimated Date and Duration
5	2	54	Building 5 - Plating, Paint Stripping, Cleaning, and Paint Shops	Industrial and nonindustrial wastes; including plating shop wastes, waste oil & solvents, metals, radiological materials.	RI/FS	Draft RI: 10/26/97 (30 days) Draft FS: 5/17/98 (30 days) PP & Public Meeting 8/15/98 (60 days) Final ROD 12/27/98	UC Berkeley Chlorinated Solvent Study Resolution Res. Seismic Study	Draft Report 5/1/97 Possible RAB presentation 4/97?
6	1	196	Building 41 - Aircraft Intermediate Maintenance Facility	Industrial and nonindustrial wastes; including waste solvents & oil, paint wastes, and hydraulic fluids.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98	Screened for TPH in soils using RBCA methodology	
7	1	112, 113, 114	Building 459 - Navy Exchange Service Station	Petroleum products; including gasoline motor fuels, waste oil & solvent.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98	Screened for TPH in soils using RBCA methodology	
8	1	75	Building 114 - Pest Control Area and Separator Pit	Pesticides; PCBs, metals, aromatic hydrocarbons.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98		

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NAVAL COMPLEX ALAMEDA
INSTALLATION RESTORATION PROGRAM (IRP) SITE STATUS SUMMARY

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IRP Site Number	OU #	Environmental Baseline Survey Parcel #	Site Name/Description	Materials Disposed of, and/or Substance(s) Potentially Released	Status	Public Review & Comment; Estimated Date and Duration*	Current Events/Actions	Public Review & Comment; Estimated Date and Duration
9	1	152	Building 410 - Paint Stripping	Industrial and nonindustrial wastes; including paints, oils, solvents.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98		
10	2	52	Building 400 - Missile Rework Operations	Industrial and nonindustrial wastes; including paint wastes, solvents, radiological materials.	RI/FS	Draft RI: 10/26/97 (30 days) Draft FS: 5/17/98 (30 days) PP & Public Meeting 8/15/98 (60 days) Final ROD 12/27/98		
11	1	137	Building 14 - Engine Test Cell	Fuels and solvents; AVGAS, JP-5, JP-7, waste oil & solvents.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98		
12	1	69	Building 10 - Power Plant	Oil; including bunker oil, gasoline, diesel.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98	Screened for TPH in soils using RBCA methodology	
13	2	142, 146, 145, 147, 148, 211	Former Oil Refinery Site	Oil; including crude oil wastes, tar and wood debris, and lead.	RI/FS	Draft RI: 10/26/97 (30 days) Draft FS: 5/17/98 (30 days) PP & Public Meeting 8/15/98 (60 days) Final ROD 12/27/98	UCBerkeley Intrinsic Bioremediation Assessment	

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NAVAL COMPLEX ALAMEDA
INSTALLATION RESTORATION PROGRAM (IRP) SITE STATUS SUMMARY

Sheet 4 of 6

IRP Site Number	OU #	Environmental Baseline Survey Parcel #	Site Name/Description	Materials Disposed of, and/or Substance(s) Potentially Released	Status	Public Review & Comment; Estimated Date and Duration*	Current Events/Actions	Public Review & Comment; Estimated Date and Duration
14	1	12, 14	Former Fire Training Area	Waste petroleum fuels and oil.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98	Screened for TPH in soils using RBCA methodology	
15	1	22, 23	Buildings 301 and 389 - Former Transformer Storage Area	PCBs and lead.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98	Evaluating soil disposition alternatives for TSTA; submit modified EE/CA	Modified EE/CA 3/15/97?
16	1	149	CANS C-2 Area (large container storage area)	PCBs, paints, solvents, acids, and bases, metals.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98	Screened for TPH in soils using RBCA methodology Draft EE/CA	2nd Qtr '97, pending Site 15 issues
17	4	Offshore	Seaplane Lagoon	Industrial and nonindustrial wastes; received untreated waste fluids containing plating shop wastes, waste oils and solvents, paints, metals, acids, caustics.	RI/FS	Draft RI: 1/4/99 (30 days) Draft FS: 6/5/00 (30 days). PP & Public Meeting 9/3/2000 (75 days) Final ROD 1/6/2001	Seaplane Lagoon Investigation Work Plan	Final 12/29/96

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NAVAL COMPLEX ALAMEDA
INSTALLATION RESTORATION PROGRAM (IRP) SITE STATUS SUMMARY

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IRP Site Number	OU #	Environmental Baseline Survey Parcel #	Site Name/Description	Materials Disposed of, and/or Substance(s) Potentially Released	Status	Public Review & Comment; Estimated Date and Duration*	Current Events/Actions	Public Review & Comment; Estimated Date and Duration
18	4	Numerous	Station Sewer System	Industrial and nonindustrial wastes; received untreated waste fluids containing plating shop wastes, waste oils and solvents, paints, metals, acids, caustics.	RI/FS	Draft RI: 1/4/99 (30 days) Draft FS: 6/5/00 (30 days) PP & Public Meeting 9/3/2000 (75 days) Final ROD 1/6/2001	Storm Drain Cleanup Ongoing, 30% complete, finish by 3/31/97	Closeout Report 6/20/97
19	2	142	Yard D-13 - Hazardous Waste Storage	Industrial and nonindustrial wastes; includes permitted haz waste storage area containing waste oil & solvents, chemicals.	RI/FS	Draft RI: 10/26/97 (30 days) Draft FS: 5/17/98 (30 days) PP & Public Meeting 8/15/98 (60 days) Final ROD 12/27/98		
20	4	Offshore	Oakland Inner Harbor (portion)	Industrial and nonindustrial wastes; received untreated waste fluids containing plating shop wastes, waste oils and solvents, paints, metals, acids, caustics.	RI/FS	Draft RI: 1/4/99 (30 days) Draft FS: 6/5/00 (30 days) PP & Public Meeting 9/3/2000 (75 days) Final ROD 1/6/2001		
21	2	135	Building 162 - Shipfitting - Small Engine Repair	Petroleum products; including gasoline, possible waste oil & solvents.	RI/FS	Draft RI: 10/26/97 (30 days) Draft FS: 5/17/98 (30 days) PP & Public Meeting 8/15/98 (60 days) Final ROD 12/27/98		

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NAVAL COMPLEX ALAMEDA
INSTALLATION RESTORATION PROGRAM (IRP) SITE STATUS SUMMARY

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IRP Site Number	OU #	Environmental Baseline Survey Parcel #	Site Name/Description	Materials Disposed of, and/or Substance(s) Potentially Released	Status	Public Review & Comment; Estimated Date and Duration*	Current Events/Actions	Public Review & Comment; Estimated Date and Duration
22	1	145	Building 547 - Former Service Station	Petroleum motor fuels.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98	Screened for TPH in soils using RBCA methodology	
23	1	148	Building 530 - Missile Rework Operations	Industrial and nonindustrial wastes; including oils & solvents, paint and metals.	RI/FS	Draft RI: 6/29/97 (30 days) Draft FS: 6/27/97 (30 days) Draft PP: 9/28/97 (30 days) PP & Public Meeting 11/12/97 (60 days) Final ROD 1/31/98		

* Assumes Background Chemical Levels Issue resolved between Navy and Cal-EPA by 1/1/97, otherwise RI, FS, and ROD dates will change to later dates.

- Operable Unit (OU) 1 - Sites 3, 6, 7, 8, 9, 11, 12, 14, 15, 16, 22, 23.
- OU 2 - Sites 4, 5, 10, 13, 19, 21.
- OU 3 - Sites 1 and 2.
- OU 4 - Sites 17, 18, 20.

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- AVGAS Aviation Gasoline
- EE/CA Engineering Evaluation/Cost Analysis
- OU Operable Unit
- PP Proposed Plan
- PCB Polychlorinated Biphenyl
- RI/FS Remedial Investigation and Feasibility Study
- ROD Record of Decision
- TSTA Temporary Storage & Treatment Area

COMMUNITY ACCEPTANCE CRITERIA

The community acceptance criteria were prepared to ensure that community concerns were addressed throughout the planning and execution of remedial action plans. By providing the Navy with clear concise cleanup objectives, which attempt to address regulatory ambiguities, these criteria should reduce the cost and effort needed to reach mutually acceptable goals for hazardous waste site cleanup.

Criteria No. 1: Cleanup Time

The Navy should complete remedial actions and follow-up monitoring by the year 2050, approximately one year of cleanup time per year of occupancy.

Criteria No. 2: Cleanup Prioritization/Level

Operable Unit No. 1 - Non-public trust lands:

Cleanup Priority: 1st

Cleanup Level: Unrestricted, no deed restrictions.

Operable Unit No. 2 - Public Trust Lands:

Cleanup Priority: 3rd

Cleanup Level: Unrestricted residential within 500 feet of shoreline;
Restricted industrial.

Operable Unit No. 3 - Landfills:

Cleanup Priority: 4th

Cleanup Level: Unrestricted residential within 100 feet of shoreline;
Restricted recreational.

Operable Unit No. 4 - Sediments

Cleanup Priority: 2nd

Cleanup Level: No completed pathways to foodchain.

Criteria No. 3 - Public Involvement in Cleanup Decisions

Communicating the risks posed by site conditions is necessary to involve the public in meaningful dialogue. In the absence of risk communication the public cannot meaningfully evaluate cleanup decision alternatives.

Maintenance of an administrative record at a local public library is the most important component of public participation. This administrative record should be updated in a timely manner.

All parties affected by cleanup decisions should participate in the decision including communities near off-site disposal facilities, ARRA, US Fish and Wildlife Service, City of San Francisco, etc.

Criteria No. 4 - Consistent Decision Process

The community's ability to participate is hampered by inconsistent processes for evaluating cleanup decisions. The community desires that the CERCLA process be adhered to during cleanup decisions at all site areas. A single standard reduces the community's burden to learn multiple process variations or to seek outside professional assistance and opinions on the Navy's work.

The Navy should also demonstrate the consistency of its cleanup decisions with decisions at other similar toxic waste sites.

Criteria No. 5 - Cleanup Levels

The cleanup goal is to eliminate all chemical residues from soils, sediments, groundwater and surface waters. The limitations and uncertainties in the risk assessment process warrant that risk assessment not be the sole basis for cleanup decisions. The use of available treatment technology together with risk management should be used as the basis for cleanup level determinations.

Criteria No. 6 - Chemical Exposure through Fish Ingestion

The exposure to chemical residues in food fish caught in the Bay indicate that this exposure pathway is complete. Eliminating this existing exposure pathway is a primary community concern.

Criteria No. 7 - Investigation of Offsite Contamination

The Navy has a responsibility to extend its investigation into city and private property and off-shore areas to determine the limits of offsite contamination.

Criteria No. 8 - Reduce Toxicity, Mobility and Volume through Treatment

Treatment should be a principal component of all cleanup decisions. The use of natural attenuation should be limited to sites where the cleanup time objectives can be met (50 years) and the existing risk is less than 10^{-6} and HI = 1.0.

Criteria No. 9 - Short-term Effectiveness - Soil Handling

Soil handling should adhere to restrictions such as listed in Attachment A.

Criteria No. 10 - Short-term Effectiveness - Contingency Plans

Planning and budgeting should ensure that work is completed expeditiously, by providing contingencies for unforeseen conditions (cost increases, flooding, etc.).

Criteria No. 11 - Corrective Action Management Units/On-site Waste Disposal

Corrective Action Management Units should be located at least 2,000 feet from residential property and at least 500 feet from all surface water bodies and seasonal wetlands.

CAMUs should be designed to RCRA specifications, and all taxes applicable to land disposal should be collected for all waste material placed in a CAMU.

Waste materials placed in a CAMU should meet the characteristics shown in Attachment B.

Criteria No. 12 - Buffer Zones

Buffer zones should be established around special property uses.

- 1) Unrestricted property use within 250 feet of existing or proposed residences, schools and parks.
- 2) Drinking water standards apply for groundwater within 750 feet of private wells, and subterranean basements.
- 3) Surface water standards within 250 feet of buried utilities (infiltration and inflow into storm sewers) and 250 feet of shoreline.

Criteria No. 13 - Offsite Disposal

Offsite disposal should only be used when the volume of waste material is too small (less than 1,000 yards) to be efficiently treated onsite, or treatment of the soil is performed prior to landfilling.

Criteria No. 14 - Contamination Residues

Contamination residues should be left in soils and groundwater only after demonstration of the use of available cleanup technologies to their level of effectiveness. When contaminant residues in soils remain, the soil should be managed in a CAMU, and with a deed restriction.

Criteria No. 15 - Background Contamination

Chemicals which are (considered to be) present at background concentrations in soils at NAS may still pose threats to human health and the environment due to their persistence and ability to accumulate in the food chain. Soils with background contamination should be managed in a CAMU, and with a deed restriction.

Criteria No. 16 - Investigation of Offsite Contamination

The Navy has a responsibility to extend its investigation into city and private property and off-shore areas to determine the limits of offsite contamination.

Criteria No. 17 - Landfill Controls

Engineering controls and barriers should ensure that the landfills do not contribute contaminants to the food chain or surface waters.

Attachment A
Soil Excavation Criteria
Corrective Action Management Units

1. Transportation

All trucks tarped when traveling on or off base.

Off island transportation should follow approved explosives route.

Truck traffic times should be limited to weekdays 8 am to 4 pm.

2. Excavation

No soil to be excavated when wind speed exceeds 15 mph.

Excavations of over 1,000 cubic yards should include ambient air quality monitoring for dust and potential contaminants.

3. Soil Stockpiles

Soil stockpiling should be performed in a dedicated area with adequate storm water run off protection.

Soil stockpiles should be placed at least 2,000 feet away from existing residences and 500 feet from surface water and seasonal wetlands.

Soil stockpiles should be inspected daily and covers repaired immediately.

Soil stockpiles should be immediately sampled and covered. No stockpiling can be performed without a budget or schedule to complete work.

4. Wet Weather (October - May)

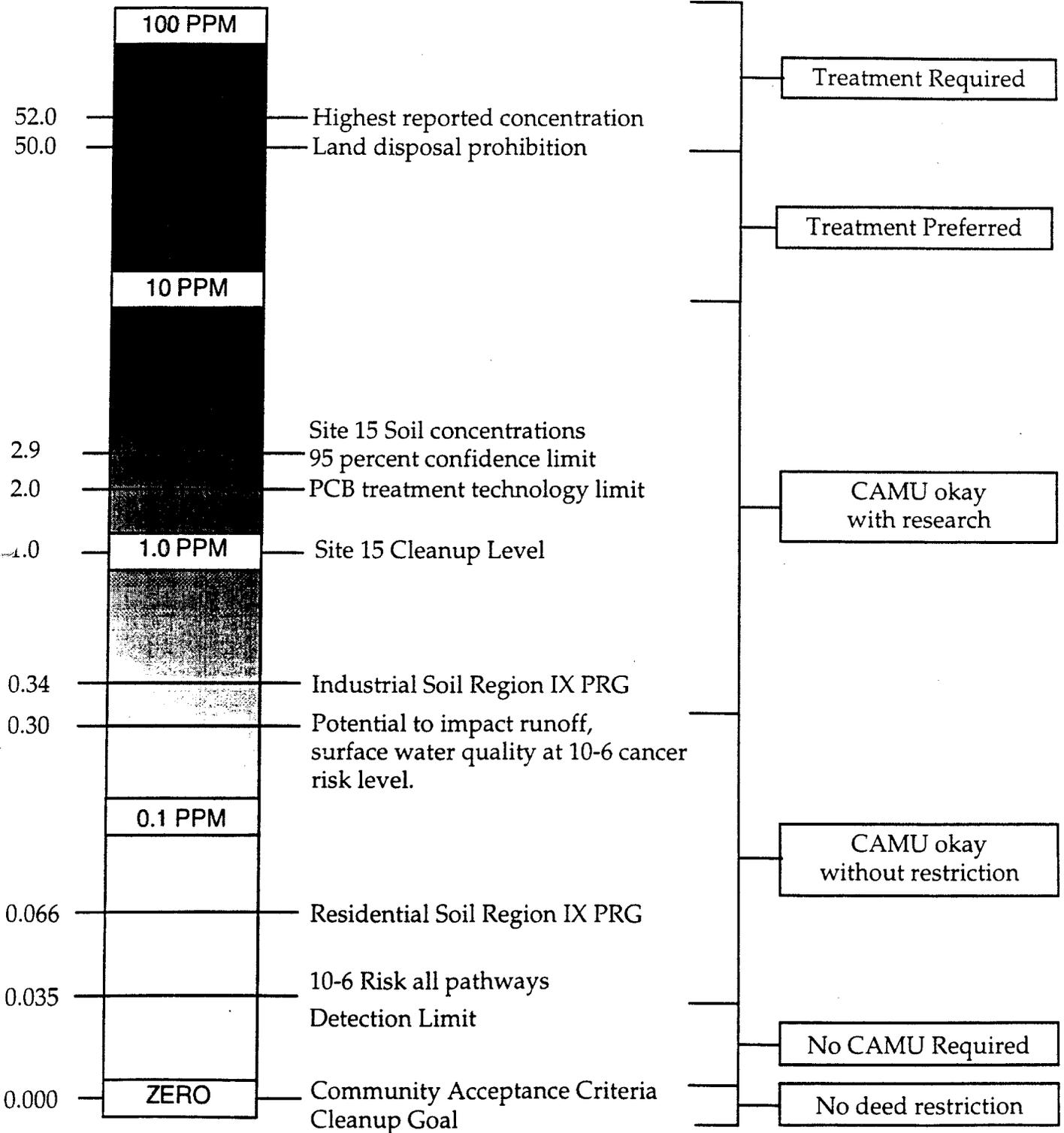
All work sites and nearby storm drains should be protected from soil and contaminated runoff during all soil excavation work.

5. Sensitive Areas

Work in areas such as Site 16 where PCBs are found in soils near a school should be scheduled to avoid potential exposure.

Ambient air monitoring should be performed to ensure no offsite impacts.

**COMMUNITY ACCEPTANCE CRITERIA EXAMPLE
SITE 15 PCB CLEANUP LEVELS**



MEMORANDUM

January 7, 1997

To: Restoration Advisory Board Members
From: Base Transition Coordinator

Subj: REUSE COOPERATIVE SOLUTIONS WORKSHOP SPONSORED BY UC DAVIS

Please take a moment to review the course description and agenda for the free workshop available on Saturday, January 25.

I attended this workshop at Sacramento in June of last year and found it to be enlightening and enjoyable. I've worked with Beth Greenwood, an attorney at Common Ground, to bring the workshop to the Bay Area. It is focused on Restoration Advisory Boards (RABs), so it has an environmental cleanup perspective, but the techniques discussed have practical application for virtually all base closure issues as well as situations encountered in our professional and personal lives.

The cost of a workshop like this one (I've attended many at UCD) would be approximately \$235, but UCD has funded the program. RAB members are invited to attend *free of charge*.

I know all of you routinely devote a great deal of your personal time to your community, but I hope you can make time in your schedules to attend. I'm sure you'll realize a direct benefit from participation. Developing new techniques to enhance productivity and enjoyment in your work is a great way to start the New Year! Please confirm as early as possible by calling Common Ground at (916) 757-8569 or (fax) (916) 757-8596.

A handwritten signature in black ink, appearing to read "Norm", is located at the bottom left of the page.

MEETING THE CHALLENGE: COOPERATIVE SOLUTIONS FOR BASE CLOSURE CLEANUP

January 25, 1997

AGENDA

- | | |
|-------------|---|
| 8:30-8:45am | Introductions
Goals & Objectives for the Day |
| 8:45-9:00 | Sources of Conflict
Ways of Dealing with Conflict
Positives and Negatives of Various Approaches |
| 9:00-9:40 | Discovering Your Own Approach to Conflict
Simulation - The Oil Pricing Exercise & Debrief |
| 9:40-10:00 | Break |
| 10:00 | What is Mediation/Negotiations
What is the Value of Mediation
Where do Negotiation & Mediation Fit in the Conflict Spectrum

Introduction to the Collaborative Problem Solving Model
Analysis
Process |
| 10:30-11:00 | Small work Group: Describe a conflict determining issues, stakeholders |
| 11:00-11:15 | Negotiating Interests
Generating Options
Follow-up |
| 11:15-Noon | Simulation: Sally Swansong |
| Noon-1:00pm | Lunch |
| 1:00-3:00 | Simulation: Locklin Mountain |
| 3:00-3:15 | Break |
| 3:15-3:45 | Special Problems

1. Dealing with difficult people
2. How to get someone to come to the table
3. When collaborative problem solving/mediation isn't appropriate |
| 3:45-4:00 | Summary and wrap up |

UNIVERSITY OF CALIFORNIA, DAVIS



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SANTA BARBARA • SANTA CRUZ

COMMON GROUND: CENTER FOR COOPERATIVE SOLUTIONS
 A UNIVERSITY EXTENSION AND
 FACULTY OF THE SCHOOL OF LAW PROGRAM
 (916) 757-8569
 FAX: (916) 757-8596

UNIVERSITY EXTENSION
 DAVIS, CALIFORNIA 95616-8727

Meeting the Challenge: Cooperative Solutions for Base Closure Cleanup

Why UC Davis?

- ✓ Office of Academic Outreach: Connecting the Resources of the University with the Community.
- ✓ UCD Defense Conversion Initiatives: for the past two years, UCD has been engaged in research, education and community revitalization at Mare Island Naval Shipyard.
- ✓ Common Ground: Center for Cooperative Solutions: A cooperative program of University Extension (the public service arm of the University) and the UCD School, helps citizens explore and create innovative solutions to complex public policy issues and problems.
- ✓ Toxic Substances Research and Teaching Program: The granting institution of this project, this program is a systemwide University of California program which facilitates research, teaching and public services in the area of toxic substances.

What Do We Want To Accomplish? Why?

- ✓ Prevention of conflicts and promotion of cooperative solutions to challenging environmental issues.
- ✓ Support and enhance efforts already underway.

What Can We Provide?

- ✓ Specific skills for achieving their goals through collaborative problem solving processes.
- ✓ Analytical framework for identifying and framing complex issues/interests/problems
- ✓ Dealing with potential dispute areas.
- ✓ Tools for resolving differences using interests to create options and generate potential solutions.
- ✓ Environment for the enhancement of the mutual exchange of resources among peers.
- ✓ Methods for dealing with specific human relations: how to deal with difficult people and emotionally charged situations.

What Is The Process? What Is Its Value?

- ✓ A systematic method of preventive problem solving. The following are some of the basic steps in that process:
 - 1) identifying key stakeholders and involving them in the process.
 - 2) clarifying issues and interests to provide a systematic framework for approaching the problem.
 - 3) creating an effective communication process and building trust.
 - 4) facilitating the process of generating options among participants.
 - 5) determining the legitimacy and selecting the most appropriate options.
 - 6) reaching resolution.
 - 7) dealing with special problematic areas.

Value:

- ✓ Efficient use of resources: time, money, information, analysis.
- ✓ May avoid litigation.
- ✓ Narrows the area of potential disputes.
- ✓ Enhances working relationships and increases trust.
- ✓ Supports the exchange of information.
- ✓ Helps build a framework for future collaborative work.

What Are Some Samples Of Specific Skills That We Can Provide Through This Workshop Grant?

- ✓ Identification of stakeholders, and their specific interests.
- ✓ Framing issues.
- ✓ Selection of an analytical framework.
- ✓ Selection of an appropriate process, including: groundrules, the role of the third party neutral, type of consensus.
- ✓ How to relate collaborative problem solving process to complex environmental issues at DoD facilities .

Workshop Information

Meeting the Challenge: Cooperative Solutions for Base Closure Cleanup

Saturday, January 25, 1997

8:30 a.m. - 4:30 p.m.

Nimitz Conference Center

Treasure Island

Fee: \$10, includes materials and lunch

For More Information please contact

Common Ground: Center for Cooperative Solutions

University Extension, University of California

Davis, CA 95616

Phone: (916) 757-8569 Fax: (916) 757-8596

Directions to the Nimitz Conference Center on Treasure Island

From the Main Gate:

Turn right at California Avenue (the first right). 3 blocks on the left-hand side is the Nimitz Conference Center Building 140, next to the tennis courts.

The workshop will take place in the Treasure Room, located in Building 140.



CalEPA

Department of
Toxic Substances
Control

700 Heinz Avenue
Suite 200
Berkeley, CA
94710-2737

COPY



Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

December 26, 1996

Mr. Hank Gee
Mr. John Corpus
Environmental Programs Division
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-2402

Dear Messrs. Gee and Corpus:

**RESPONSE TO COMMENTS ON DRAFT METHODOLOGY FOR HUMAN
HEALTH RISK-BASED TIERED SCREENING ANALYSIS TECHNICAL
MEMORANDUM, DECEMBER 12, 1996, NAVAL AIR STATION,
ALAMEDA**

The Department of Toxic Substances Control (DTSC) has received the Response to Comments on the Draft Final Methodology for Human Health Risk-Based Screening Analysis Technical Memorandum dated December 12, 1996 and Final Methodology for Human Health Risk-Based Tiered Screening Analysis Technical Memorandum. These documents address protocols for the evaluation of human and ecological risk at potential hazardous substance release sites at Naval Air Station, Alameda. After reviewing the documents, we believe that there is confusion between the Navy's position as agreed to in discussions with State and federal environmental agencies, and the Navy's position as written in the subject document. Further, we are concerned that the Navy chose to complete the subject document before discussing the Navy's response with the environmental agencies.



Printed on Recycled Paper

Messrs. Gee and Corpos

December 26, 1996

Page 2

Intensive discussions between the Navy and the agencies had occurred over several months and involved the agencies' and Navy's staff and management. As a result of the most recent of these meetings between the agencies and the Navy, we were led to believe that Environmental Baseline Survey (EBS) normally prepared to provide information to support property transfer activities would also be completed at NAS Alameda to satisfy requirements of the Preliminary Endangerment Assessment (PEA) and the RCRA Facility Investigation (RFI). In particular, we understood that screening levels for hazardous constituents would be consistent with a risk of $1 * 10^{-6}$. It is important to note that we believe a risk screening level of $1 * 10^{-6}$ is necessary to protect public health and the environment. The response to DTSC and USEPA comments is clearly inconsistent with agreements reached in our discussions, and is also inconsistent with public health and environmental protection. Further, an adequate RFI at NAS Alameda is specifically required by the RCRA Facility Permit issued by the DTSC in 1993.

DTSC continues to insist that the value to be used as the default human health risk based screening level must be $1 * 10^{-6}$, based on standard methods of risk assessment, and that risk management decisions must be made within the risk range of $1 * 10^{-4}$ and $1 * 10^{-6}$, based on site specific factors and data. Other aspects of the Navy's response are also inconsistent with the above-noted agreements. These include the Navy's insistence on the use of ambient polycyclic aromatic hydrocarbons (PAHs) concentrations to eliminate chemicals as Contaminants of Concern, and the Navy's insistence that the Tiered Screening Process (EBS) be informational only (like a property transfer document) rather than investigative in nature (like a CERCLA document).

Messrs. Gee and Corpos

December 26, 1996

Page 3

Additionally, the Navy has not yet presented their position on whether a restriction on land use is considered a remedial action as defined by CERCLA.

We believe that an innovative and economical approach for integrating the investigation of potential hazardous substance release sites into a single program has been jeopardized by the previously discussed inconsistencies. Based on the Navy's documents, we are concerned that the Navy may not be able to meet regulatory and legal requirements of RCRA and CERCLA within the EBS process, stated intentions notwithstanding.

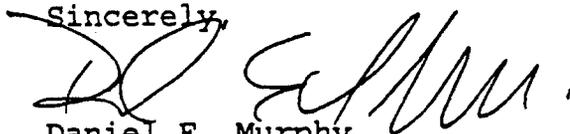
We prefer to resolve this issue quickly through immediate discussions with the Navy and the other regulatory agencies. In general, we expect the Navy to honor agreements reached with the environmental agencies in our most recent discussions, and to change the Tiered Screening Methodology accordingly. In particular, we expect the Navy to implement risk screening using $1 * 10^{-6}$ as the default screening level; to evaluate with the environmental agencies, on a case by case basis, the need for further action at sites within the risk range of $1 * 10^{-4}$ and $1 * 10^{-6}$; to complete risk assessments using all organic constituents; and to evaluate all potential hazardous substance release sites consistent with RCRA, CERCLA, and Chapter 6.8 of the California Health and Safety Code. Further, we request that the Navy provide a proposal for preparation of decision documents where restrictions on use are indicated. We believe that resolution must occur prior to the Partnering Workshop scheduled for January 14, 1997; otherwise, we believe that the workshop will focus too much on these fundamental issues, and not sufficiently on the more beneficial areas of communication and team building.

Messrs. Gee and Corpos
December 26, 1996
Page 4

Should this issue continue to be unresolved, we will consider appropriate administrative and enforcement actions to ensure compliance with RCRA, and the National Contingency Plan (NCP) as implemented under CERCLA and Chapter 6.8 of the California Health and Safety Code.

If you have any questions regarding this letter, please call me at (510) 540-3772.

Sincerely,

A handwritten signature in black ink, appearing to read "D. E. Murphy", written over the typed name.

Daniel E. Murphy
Chief, Closing Bases Unit
Office of Military Facilities

cc: See next page.

Messrs. Gee and Corpos

December 26, 1996

Page 5

cc. Ms. Gina Kathuria
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Mr. Steve Edde
Base Environmental Coordinator
Alameda Naval Air Station
Building 1, Code 52
Alameda, California 94501

Mr. James Ricks
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Ms. Camille Garibaldi
Engineering Field Activity-West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-2402

Ms. Ardella Dailey
Community Co-Chair
Restoration Advisory Board
2200 Central Avenue
Alameda, California 94501



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Ms. Ann Klimek
Code 1824.1
NAVFACENCOM
Engineering Field Activity, West
900 Commodore Drive
San Bruno, California 94066-2402

22 October 1996

Re: U.S. Environmental Protection Agency Review Comments - Draft Final Methodology for Human Health Tiered Screening Analysis Technical Memorandum and Responses to Comments, Naval Air Station (NAS) Alameda, Alameda, California, dated 12 July 1996

Dear Ann:

The U. S. Environmental Protection Agency (EPA) has completed its review of the subject documents. The Agency's general and specific comments are discussed in Attachment I. In Attachment II, EPA has identified several technical issues that we recommend as agenda items for the Navy, CAL-EPA and U.S. EPA meeting scheduled for 23 October 1996 at 1:00PM.

At this meeting, Dr. Sophia Serda, EPA's Regional Toxicologist, Region IX, will offer a proposal that EPA believes accommodates the concerns of both the Navy and the regulatory agencies regarding decision-criteria in the risk-based screening. EPA is of the opinion that the proposal will lead to resolution of the tiered-screening for human health as well as significantly contribute to resolving several outstanding issues associated with the background discussions.

The following discussion summarizes EPA's major concerns identified upon completion of our review and evaluation of the documents. In general, while some of our comments were addressed, the majority, however, were not and thus EPA's evaluation has concluded that the Navy's draft final document, in toto, is non-responsive. Therefore, rather than resubmit our previous comments, EPA is proposing a two-fold strategy. First, we are requesting that the Navy revise the responses to our comments which EPA has determined as non-responsive. And second, the Agency is willing to discuss the review comments to provide clarification regarding the issues.

In terms of the context, EPA is quite concern with both the content and the tone of the Navy's responses to our comments on the Draft methodology proposed for the human health risk-based screening analysis. In terms of the former and as discussed

above, EPA can only infer that the Navy's failure to address our comments is based, at best, on a misunderstanding of the Agency's policy, in general and Region IX's guidance in particular.

However, it is with reference to the tone of the Navy's responses, that the Agency is quite concerned. EPA believes it reflects substantial erosion of the "spirit of partnering" and "open discourse" between the Navy and the regulatory agencies.

As illustrative of these points, we in particular note the Navy's responses to EPA's comments number two (2) [See page twelve (12) and thirteen (13), respectively, under Section 3.0]. In reference to this response which addresses uncertainty associated with the risk screening analysis, the import of EPA's review comment was contrary to the Navy's interpretation. Essentially, EPA's point is that no fundamental differences exists between EPA Region 9 and EPA headquarters regarding risk assessment policy and guidance. As we stated in our comments, EPA Region 9 PRGs are, in fact, based on "the most current EPA Risk Assessment Guidance and Toxicological Information obtained directly from EPA Headquarters and the Office of Research and Development (ORD)." Moreover, we further noted that the 1989 EPA guidance document cited by the Navy contained methodology that has since been superseded by numerous directives and guidance.

More to the point however, is the manner in which the Navy's chose to respond to EPA's comment. And it is in this regard that the Agency registers much disappointment because it fundamentally raises questions regarding the very principles of our working relationship at NAS Alameda, i.e., "the spirit of cooperation and partnering." The NAS Alameda Project Team has dedicated tremendous expenditures of time and energy to the cleanup of the Alameda site. The shared BCT "point of departure" is to perform these tasks in a manner that reflects efficient use of taxpayers funds, and that is both protective and that facilitates reuse. EPA appreciates the Navy's cooperation and willingness to collectively and innovatively work to resolving problems and clarifying issues.

Therefore, we were dismayed that the Navy, in response to several of our comments, did not request a meeting or conference call to clarify issues prior to writing the draft final. This approach has work very successfully in the past and would have been very beneficial to all parties involved in reviewing the subject documents. Instead, the Navy choose to expend energy seeking guidance from sources other than EPA Region 9 (viz., other EPA regions) and, including EPA headquarters.

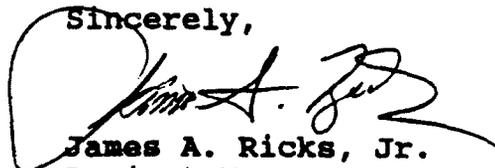
Admittedly, it is the Navy's prerogative to pursue other sources of information. However, EPA believes it is a reasonable expectation that the Navy, consistent with "our spirit of cooperation," would provide Region IX with a professional courtesy notification of its intentions. Consequently, we now have to address and clarify guidance and interpretations that are not applicable to the specific site conditions at NAS Alameda.

EPA Region IX remains cognizant of the application of risk assessment policy in other regions, and where appropriate will incorporate those approaches in Region IX interpretations and applications. This notwithstanding, EPA Region IX interprets EPA Headquarters policy in this region. Moreover, the implementation of EPA's and Region IX's risk assessment policy has been successfully implemented at numerous Navy facilities in California and in a manner that has facilitated the expeditious forwarding of leases/property transfer as well as RI/FSS and RODs.

EPA reaffirms its commitment to working in partnership with the Navy. And pursuant to this end, we reiterate our recommendation that the regulatory agencies be given an opportunity to discuss, informally if the Navy prefers, early drafts and revisions prior to formal submittal. This is not only consistent with partnering but reduces the time required for final regulatory acceptance.

Should you have any questions regarding EPA's review comments or require additional information, please contact me at (415) 744-2402.

Sincerely,



James A. Ricks, Jr.
Project Manger

cc/w enclosures: T. Lanphar, CAL-EPA (DTSC)
J. Polisini, CAL-EPA (HERD)
G. Kathuria, CAL-EPA (RWQCB)
S. Edde, BEC, NAS Alameda

FROM: EDGEE KIKUGAWA	From: MARIE
Co. RAINWATER	
Phone # 222-8277	
Fax # 244-2659	

5090.

Ser 1824.5/

7 January 1997

From: Commanding Officer, Engineering Field Activity West, Naval Facilities Engineering Command
 To: Distribution

Subj: METHODOLOGY FOR HUMAN HEALTH RISK-BASED TIERED SCREENING ANALYSIS

Ref: (a) EPA Letter of 24 Dec 96
 (b) DTSC Letter of 26 Dec 96
 (c) Conference Call 2 Jan 97 between EFA-West (Ms. Ann Klimek), DTSC (Mr. Thomas Lanphar and Mr. David Rist), PRC (Ms. Theresa Lopez, Mr. Dan Shafer and Mr. Duane Balch)
 (d) Interagency Partnering Guidance, dtd 15 Apr 96

1. This letter responds to references (a) and (b) regarding the Response to Comments on the Draft Final Methodology for Human Health Risk-Based Tiered Screening Analysis Technical Memorandum and the Final Methodology for Human Health Risk-Based Tiered Screening Analysis Technical Memorandum for NAS Alameda, both dated 12 December 1996. The Navy developed the Human Health Tiered Screening to ensure that property transfer decisions are fully protective of human health and the environment while supporting the President's plan of expedited property transfer to the local communities in a timely and cost savings manner. The Department of the Navy as lead federal agency will continue with the plan as outlined by DoD policy and as detailed in the Tiered Screening Methodology.

2. The Navy will continue to uphold all agreements made with the regulatory agencies as we had indicated in our previous discussions regarding the Human Tiered Screening approach and in our numerous correspondence with the agencies and the community. The above two documents discuss these in detail.

3. We regret the confusion in the issuance of the two documents. Our intent was to provide the Response to Comments document and ensure that all parties understand the various positions related to the methodology. The final methodology would then be issued shortly thereafter with an official transmittal letter. As you had already received both documents on December 12th, we propose the following to rectify the situation. The Navy will add a statement to page 11, section 2.2, and page 13, section 2.2.1, of the Final Methodology identifying the risk management range in the Technical Memorandum as 10^{-4} to 10^{-6} . Additionally, the Navy will revise page 9, section 2.1, to reflect that PAHs will be carried through the risk screening in the Tier I screen. As stated in the documents and discussed in reference (c), the Navy will also do the following:

a. The Navy will follow DoD policy for property transfer; but as agreed with the agencies, risk management decisions will be incorporated in the 10^{-4} to 10^{-6} risk range. This information will be presented to the agencies for comment.

b. The organics will be used in the Tier II screening as developed for the Installation Restoration Program for use in determining background.

DRAFT

c. The decision documents to transfer property screened for industrial-like use will be outlined by Navy legal counsel and distributed to the agencies. We expect that the Navy position on this issue will be prepared by March 1997.

d. The revised final methodology will be provided to the agencies on January 17, 1997.

4. Based on the discussions held during reference (c) and as reiterated above, it is hoped that the Navy's position on this issue has been clarified. Therefore, although there may be some details that need to be finalized as the tiered screening process is implemented, the Human Health Tiered Screening Methodology is not planned for nor should it be the focus of discussion at the partnering session to be held next week.

5. The Navy is moving forward, and we would like to continue working with you on this approach. If you have specific concerns and supporting basis about how we are not being fully protective of human health and the environment, we request that you inform us of those in writing. Also notify us if you are aware of compliance issues we are not meeting. I hope that the working relationship between the Navy and regulatory agencies continues to be professional and forthright, as described in reference (d), and that these qualities not erode with the difficult technical decisions the team must make to expedite cleanup and property transfer.

6. If you have any further questions or need further clarification, please contact Ms. Ann Klimek at (415) 244-2714, or Mr. John Corpus at (415) 244-2578.

HENRY C. GEE
By direction

Distribution:

State of California, Regional Water Quality Control Board (Attn: Mr. Ron Gervason)
State of California, Regional Water Quality Control Board (Attn: Ms. Gina Kathuria)
State of California, Dept. of Toxic Substances Control, Region 2 (Attn: Mr. Thomas Lanphar)
State of California, Dept. of Toxic Substances Control, Region 2 (Attn: Mr. Daniel Murphy)
U.S. Environmental Protection Agency, Region IX (Attn: Mr. James Ricks)
U.S. Environmental Protection Agency, Region IX (Attn: Mr. Tom Huetteman)

Copy to:

U.S. Navy, NAS Alameda (Attn: Mr. Steven Edde)

Post-it® Fax Note	7671	Date	# of pages ▶ 2
To	GEORGE KIKOSIAN	From	MARIE R.
Co./Dept.		Co.	
Phone #		Phone #	222-8277
Fax #	244-2654	Fax #	

ATTENDANCE LIST

07 JANUARY 1997 RESTORATION ADVISORY
BOARD MEETING SUMMARY

THE ABOVE IDENTIFIED LIST IS NOT AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
SOUTHWEST DIVISION TO LOCATE THIS LIST.

THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132

TELEPHONE: (619) 532-3676