

**Manley, Melissa A**

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**From:** Richardson, Claudia CONT OASN (I&E) BRAC PMO West [claudia.richardson.ctr@navy.mil]  
**Sent:** Tuesday, November 15, 2005 11:32 AM  
**To:** Bonnevie, Nancy; Manley, Melissa A  
**Subject:** FW: David Cooper's Comments on Alameda NAS's Seaplane Lagoon

**Attachments:** Seaplane Lagoon PP comments.doc



Seaplane Lagoon  
PP comments.do...

Nancy, Melissa,  
Please see EPA's David Cooper's comments. Feel Free to call me if you want to talk to me before making suggested changes.

Also please note my new email address & last name (maiden name).

Thank you  
Claudia Richardson  
Alameda Remedial Project Manager  
mail to:claudia.richardson.ctr@navy.mil  
619-532-0935

-----Original Message-----

**From:** Ripperda.Mark@epamail.epa.gov  
[mailto:Ripperda.Mark@epamail.epa.gov]  
**Sent:** Monday, November 14, 2005 16:49  
**To:** Richardson, Claudia CONT OASN (I&E) BRAC PMO West; Macchiarella, Thomas L CIV OASN (I&E) BRAC PMO West  
**Cc:** Cook.Anna-Marie@epamail.epa.gov  
**Subject:** David Cooper's Comments on Alameda NAS's Seaplane Lagoon

Hi Claudia, I just found out that I am going to help out in the Gulf for a few weeks, so I don't have time to edit, or even read, these, so I am just passing all of his comments through to you. Because David can sometimes be impolite in his comments, don't include these in the response to comments, just incorporate his suggestions or textual edits when appropriate.

----- Forwarded by Mark Ripperda/R9/USEPA/US on 11/14/2005 04:42 PM -----

David Cooper  
Anna-Marie Cook/R9/USEPA/US@EPA  
11/14/2005 02:54  
PM  
Seaplane Lagoon

**To:** Mark Ripperda/R9/USEPA/US@EPA,  
**cc:** Angeles Herrera/R9/USEPA/US@EPA  
**Subject:** Comments on Alameda NAS's

Folks --

A bunch of issues with this one that should have been corrected by now. This is the 4th or 5th Alameda plan I've reviewed. Even the glossary is still full of mistakes.

I have a number of more serious concerns, including the elimination of alternatives from within the proposed plan (as opposed to in the FS), the elimination of one option apparently principally for cost (the other reason isn't well-explained), and the claim that the preferred remedy demonstrates a preference for treatment, when it's just a dig-and-haul.

I hope to get to the Todd Shipyards (IR Site 28) soon. Please let me know if it's a crisis and I'll try to adjust.

-- Dave

(See attached file: Seaplane Lagoon PP comments.doc)

Comments on Seaplane Lagoon  
051110

General

1. I didn't have as much time to go over this as with previous fact sheets. I probably missed items. If my comments or explanations appear brusque, it's only to save time. I would welcome an opportunity to answer your questions.
2. This proposed plan contains a number of improvements over previous plans but still contains many of the same errors and missed opportunities for clarity. It raises questions as to whether different writers are authoring these proposed plans, whether they are talking to each other about improvements incorporated from regulatory comments on previous proposed plans, and whether the Navy is using the same reviewer/ quality control people for all proposed plans.
3. The fact sheet has some enormous paragraphs, particularly on Page Four. Except for the first page, the formatting lacks columns, which impacts readability. A two-column format usually works best.
4. The fact sheet is longer than it needs to be. Extra length in a document for the general public detracts from readability. There are many examples where the text appears to be cut from other document resulting in either redundancies or places where the context can be inferred (like the constant repetition of the site name, which the reader already knows). Careful editing will not always drop the page count, but it may help.

Specific

1. Heading. I'd change the October date to the actual date so it doesn't risk falling through the cracks during final production.
2. Heading. The banner doesn't identify the facility. I would put "Alameda NAS" or "Former NAS Alameda" or something like that.
3. Page 1. First paragraph. The first sentence says that this fact sheet provides public notice. An actual display ad public notice in the appropriate local paper is also required.
4. Page 1. First paragraph. The first sentence is poor. The first sentence should contain the most salient points: "The US Navy invites the public to provide comments on the cleanup options it considered and the preferred remedy it identified for the Seaplane Lagoon site at the former Alameda Naval Air Station." A second sentence could identify the comment period and a third sentence could encourage people to attend the public meeting. I would then do a new paragraph stating something like: "The Navy will consider all comments before making a final decision and that the remedy may change based on public comments." I would finish with the statement: "Additional information on the Seaplane Lagoon investigations and the study of cleanup options, along with all

information that the Navy used in preparing its proposed plan, is available in the Information Repositories listed at the back of this document.”

5. Page 1. First paragraph. The first paragraph is poor. It contains no less than 10 acronyms. This is not a good way to encourage the reader to continue with the document. It also requires the reader to hold a lot of information that is not necessary to understand what the Navy proposes to do, what the Navy considered in reviewing the options, and why the Navy chose the particular option. Everything from the words “in accordance with the Comprehensive...” could appear much later in the document without any impact to its readability or its utility.

6. Page 1. First paragraph. There are a number of items that are bolded. If these are intended as glossary items, then the first occurrence should have an asterisk, the asterisk should appear at the bottom of the page with an explanation, and the current explanation, which is located on the last sentence of the page, should be deleted.

7. Page 1. Remaining paragraphs. These all contain useful information, but the most important information – for the first page – is the identification of the preferred remedy. There is some redundancy between the opening of the second paragraph (which talks about the overall IR program and is true but not necessary) and the last paragraph, which also talks about historical investigations activities. I would move forward the preferred alternative part of Paragraph Three to after the information I wrote about above.

8. Page 1. Box. I would add “Comment” to the title to reinforce the purpose. I would highlight the comment period in the title – it is an important part of the notification. I would replace the word “discuss” with the word “comment,” again to reinforce the purpose.

9. Page 2. Second paragraph. The last sentence doesn’t fit the section’s title.

10. Page 2. CERCLA process. Fourth column. The public has the opportunity to comment on all the alternatives, not just the preferred one.

11. Page 3. Figure 2. The site can be more clearly identified by making the “Seaplane Lagoon” text larger.

12. Page 3. RI. The investigations section can be combined. You don’t need the RI purpose in the second sentence.

13 Page 4. First paragraph. This paragraph is huge. Please make it more manageable. The first sentence begins with text that is similar in thrust to the previous page. Since you’ve already said on the previous page that the next section (this section) will be the results, you don’t need some of the first couple of sentences. You could, in fact, begin at the end of the fourth line: “Cadmium, chromium, copper...are present [skip Seaplane Lagoon] at higher than ambient...”

14. Page 4. First paragraph. Last sentence. It's not clear to me if you're saying all the data or just the RAD data. This sentence might work better elsewhere.

15. Page 4. Figure 3. This could be a very useful figure, but it doesn't present the data that concerns most readers. Figure 3 gives sampling locations and muddies up the figure with data descriptions related to when the samples were taken. Appropriate concentration numbers (not for every sampling location or every constituent) would be much more useful. In other words, what you found is much more pertinent than when you looked. Showing all the data would be too busy, but some data would help them understand the remedy options.

16. Page 5. Figure 4. While the figure is interesting, I am not sure of the purpose as it relates to understanding the various cleanup options. It would save half a page to delete it.

17. Page 5. Ecological Risk Assessment. The first sentence repeats information from the previous paragraph. The next few sentences on the tiers is unnecessary. You could start this section on Line Six with: "The baseline ERA evaluated risks to..."

18. Page 6. First paragraph. This paragraph references risk, but does not quantify them. It seems like numbers would be useful, since that's what you're trying to reduce.

19. Page 7. Proposed Remediation Areas. The last sentence seems like it belongs with a description of the proposed remedies. This comment is actually pre-decisional because it pre-supposes and promises that the final remedy will include sediment removal, and this can only be decided after all public comments are received and evaluated.

20. Page 8. Figure 5. This figure has a large number of elements that don't seem relevant to the purpose of the figure. I would delete all sampling points except those that are either inside the shaded areas or abut them, so that the proposed cleanup area can be delineated. This figure poses another question: if the shaded area represents the preferred option, what would be the cleanup area of the other options...bigger, smaller? That question is relevant to a reader who is trying to understand the differences in the options and make comments on them.

21. Page 8. Last paragraph. I question whether Alternatives 2 and 4 should be in this fact sheet. The public should only be called on to comment on viable alternatives. If 2 and 4 do not meet the either threshold criterion, the public should not have to consider them. If 2 and 4 fell out of the evaluation process in the FS, it's usually not necessary to reference them in the proposed plan (an obvious exception would be if the public had already expressed a preference for an alternative and would need to know why it was eliminated). It would be appropriate here to renumber the cleanup options.

22. Page 8. Last paragraph. I question whether Alternative 7 should be eliminated. It appears that the principal reason is cost. My understanding is that cost should be used as a basis for not picking a viable remedy, not a reason for not considering it. The whole

purpose of presenting the options to the public is for them to see how the various methods compare. If two different options both meet the threshold criteria and are effective over the long-run, then a viable option that is six to ten times more expensive than the other would not be chosen for cost reasons. But the public should have the right to consider it. This does put the onus on the Navy to explain in the justification section how the less expensive remedy is as protective of human health and the environment. To eliminate Alternative 7 seems pre-decisional to me.

23. Page 9. Table 2. Again, if some of these alternatives are not viable and can not be chosen as the final remedy, they should not be in this table. I would delete the cost table. This sends the message that the final decision will be based on cost and duplicates information that should (but doesn't currently) reside in Table 4, the comparison of alternatives.

24. Page 9. Table 2. Options 5 and 6 use different language ("upland disposal" and "upland confinement"), but Option 6's text description says that its disposal would be similar to 5. What is the difference between disposal and confinement?

25. Page 10. Evaluation of Cleanup Alternatives. This is the very heart of the proposed plan and not particularly effective. This section never explicitly compares the strengths and weaknesses of the alternatives. It uses a fairly uninformative table (Table 4) to make unquantified judgments. In some cases, either of two alternatives would seem to fully meet the criterion, but one receives a "moderate to high" rating without explanation.

26. Page 10. Evaluation. The text says it is comparing 9 criteria, but it is only using 7. The text should be corrected.

27. Page 10. Evaluation. The footnotes are so important that I think they should be part of the normal text.

28. Page 11. Table 4. Once an alternative has been eliminated, you don't do further analysis. The No Action option is not protective, so you don't evaluate the balancing criteria. The justification for the "moderate to high" ratings (i.e., the differences between moderate and high) are not quantified or qualified, making this information totally subjective. This is the place where the cost information should be located. In these kinds of tables, always put in quantified data over qualified data.

29. Page 12. ARARs. This is a totally unnecessary over-two-page discussion. To be considered as a viable option, all alternatives must meet all ARARs. It does not help the reader to read through this material. If, in the agency's view, there is a particular decision about making a specific ARAR a requirement (or eliminating it), and that this could lead to controversy, then a very short section or paragraph should be added to address only that issue. Again, the proposed plan is supposed to help the reader to discriminate between cleanup options and decide which they prefer. Information that is common to all viable options should be kept to a minimum. You can always refer the reader to the FS or to information on the site's web page.

30. Page 14. Preferred Alternative. This section was supposed to, in text form, explain why the Navy is proposing one alternative over another. It doesn't do that. It simply states that, in the opinion of the BCT, it is the best. This is the section where you explain why that is a true statement. This section should be re-written to do that. In the first paragraph, it would be good to add to the last sentence (or as a final sentence) that the final decision will be made after all public comments have been considered.

31. Page 14. Preferred Alternative. The second paragraph title does not match the earlier description. Did something change? For the Box – I think you need an “and” after Realignment.

32. Page 15. Summary Statement. This seems duplicative of the previous section on Preferred Alternative. Further, I question whether Items 4 and 5 are true. I don't see how digging up the sediment and landfilling it is *treatment*. More than one RPM has told me that treatment means reducing the volume or toxicity through some chemical or mechanical means, and that landfilling does neither. I don't see how it is a principal element. Other RPMs have seemingly ignored the latter part of the statement (the “treatment” part) and focused on the part that says “reducing mobility” to suggest that confinement in a landfill prevents migration.

33 Page 15. Public Involvement. I don't think you need to capitalized “Of The” for Navy. I think there's a mistake with your brackets. I appreciate that the comment period is bolded. That information should be on the first page.

34. Page 15. No Section. I don't see a reference to any information on the web. Is there a web site with all or some of the AR?

35. Page 16. The AR is supposed to be available to the public so they can comment. Having the AR 500 miles away in San Diego is not appropriate. The complete AR, in hard copy or CD, must be available in the IR near the site. The fact sheet should be changed to reflect this and the documents should be *in the IR in Alameda by the start of the comment period*. I would reversed the last two paragraphs to emphasize the appropriate IR – the Alameda IR.

36. Page 17. Glossary. There are a number of mistakes and possible improvements. Someone should review this and perform edits. For ARARs, you shouldn't use the thing you're defining in the definition. In BCT, you shouldn't use acronyms for the agencies. You should say State of California X and Y. For ICs, some examples would be more meaningful than non-engineered mechanisms. You're defining jargon with jargon. The PRG definition is wrong. Delete the first part; start with “Concentrations that represent safe levels...” Remedial alternatives is not very useful. Again, using remediation jargon. RI definition sentences should be reversed. Start with “The RI determines the nature and extent of contamination at the site, i.e., how far it has spread, how deep has it gone, and which chemicals are present and at what concentrations.” The remark about the FS is unnecessary.