

Manley, Melissa A

From: Richardson, Claudia CONT OASN (I&E) BRAC PMO West [claudia.richardson.ctr@navy.mil]
Sent: Tuesday, November 15, 2005 11:46 AM
To: Bonnevie, Nancy
Cc: Manley, Melissa A
Subject: FW: EPA Comments on the Seaplane Lagoon PP

Attachments: Seaplanelagoon.pp.epa.doc



Seaplanelagoon.pp.
epa.doc

Nancy, Melissa,
Please see EPA Mark Ripperda comments.

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 10:49
To: Judy Huang; Jean S Sweeney; Richardson, Claudia CONT OASN (I&E) BRAC PMO West
Cc: Cook.Anna-Marie@epamail.epa.gov; chuang@OSPR.DFG.CA.GOV; MLiao@dtsc.ca.gov;
Macchiarella, Thomas L CIV OASN (I&E) BRAC PMO West; Leith.Suzette@epamail.epa.gov;
Cooper.David@epamail.epa.gov
Subject: EPA Comments on the Seaplane Lagoon PP

Hi Thomas and Claudia, here are our comments on the Draft Proposed Plan for the Seaplane Lagoon. Most of my textual edits were done with the goal of making the document shorter and more direct. I think that David Cooper may also be submitting comments from our Community Involvement group. If so, I will send them under seperate cover.

EPA agrees with dredging the contaminated sediments as the proposed remedy, but we would like to see the remedial action goals reflect the Regional Board's work on developing PCB TMDLs.

(See attached file: Seaplanelagoon.pp.epa.doc)

EPA Comments on the Draft Proposed Plan for the Seaplane Lagoon at Alameda Point

1. Page 1, Second Paragraph. Please delete the first sentence and edit the remainder of the paragraph to something like: “Historically, untreated industrial wastewater and stormwater were discharged into the Seaplane Lagoon. Seven alternatives were developed to address the sediments that were contaminated by these discharges”.
2. Page 2, Last Sentence of Second Paragraph. The text states that remediation will not be undertaken until all potential residual sources of contamination have been isolated. When will this happen and how will it be coordinated with this action.
3. Page 1, Third Paragraph. Please change the first sentence to: “The Navy is now proposing a Preferred Alternative for public comment that involves dredging sediments from the northeast and northwest corners of the lagoon, disposal of the ...”.
4. Page 3, Remedial Investigation: Please change the second sentence to: “The RI characterized the conditions at the Seaplane Lagoon, described the ...”.
5. Page 4, First Paragraph. Please change the beginning of the paragraph to: “Numerous sediment samples were collected and analyzed for potential contaminants of concern (Figure 3). Several metals (i.e., cadmium, ...”. Please also remove the word ‘very’ from the second to last sentence of this paragraph.
6. Page 6, Conclusions of the Remedial Investigation. Please change the last bullet to: “Local site risks to human health were primarily ...” and add a bullet that says something like: “Ambient levels of PCBs are generally high throughout the San Francisco Bay. The levels of PCBs in the Seaplane Lagoon will be reduced to an average of 200 ppb to remove potential source contamination to the rest of the Bay”.
7. Page 7, First Paragraph. Please remove the second and third complete sentences starting with: “Numerical goals could not be ...” and then the word “Similarly” from the fourth sentence.
8. Page 7, Second Paragraph. Please replace the second sentence with something like: “The average PCB sediment contamination concentration in the Seaplane Lagoon is calculated to be less than 0.2 mg/kg after this proposed action, thus mitigating risk to consumers of potentially contaminated sport fish.

9. Page 7, Table 1. Please change this table to:

Contaminant	Remediation Goal (mg/kg)
Cadmium	24.4
PCBs	1.13 (ecological) 0.2 (average for human health)
DDx	0.13

10. Page 8, First Paragraph. Please remove “(including the No Action Alternative)” from the second sentence.
11. Page 10. Please remove the first sentence.
12. Page 10. Please remove the first sentence of the third Paragraph (starting with “Alternatives 1, 3, 5, and 6 were ...”).
13. Page 11, Table 4. The complete title for the second modifying criteria is “Reduction in Toxicity, Mobility, and Volume Through Treatment”. EPA guidance is clear that treatment must specifically address the chemical contaminant, thus, capping, institutional controls, and dredging followed by upland confinement should all score low for this criteria.
14. Page 11, Table 4. Why don’t Alternatives 5 and 6 score the same for Short-Term Effectiveness, and why don’t they both score HIGH like Alternative 3.
15. Page 12. Please remove the ARARs analysis section. The ARARs are sufficiently presented for a Proposed Plan in the Evaluation of Cleanup Alternatives.
16. Page 15. Please change the EPA point of contact for this site to Mark Ripperda. Phone numbers and email should also be provided for all of the points of contact.
17. Page 15, Summary Statement. The preferred alternative does not need to “satisfy” the balancing criteria. It would be better to say that the preferred alternative satisfies the two threshold criteria and the Preferred Alternative was determined to be appropriate after weighing the balancing criteria. It would be helpful to include a discussion of how the balancing was done and why this alternative was chosen -- e.g., good protection at a reasonable cost.
18. In some places the term “upland disposal” is used, and in others, “upland confinement.” This is especially confusing as some of the alternatives were described as including disposal, others confinement. This should be clarified and/or made consistent. See, e.g., p. 2, 9, 11 and 14.