



Department of
Toxic Substances
Control

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ALAMEDA POINT
SSIC NO. 5090.3



June 10, 1997

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

Commander
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Camille Garibaldi
900 Commodore Drive
San Bruno, California 94066-2402

Dear Ms. Garibaldi:

**DRAFT ADDENDUM ENGINEERING EVALUATION/COST ANALYSIS
SITE 15 - SOIL REMOVAL ACTION; DRAFT ENGINEERING
EVALUATION/COST ANALYSIS SITE 16 - SOIL REMOVAL ACTION,
AT THE FORMER NAVAL AIR STATION, ALAMEDA**

The Department of Toxic Substances Control (DTSC) has reviewed the draft Engineering Evaluation/Cost Analysis (EE/CA) for removal actions at Sites 15 and 16. Both of these removal actions involve the removal of PCB and lead contaminated soil. Please respond to the following comments and incorporate them into the draft EE/CAs, issued for public review and comment, for each site. The DTSC would like the opportunity to review the public review draft EE/CAs prior to public release.

Site 15 draft Addendum EE/CA

1. Page 2-5, Section 2.1.2 Type of Facility and Operational Status

The second paragraph of this section states that the TSTA was constructed to allow the construction of a major sewer facility which crosses at Site 15. While it is true that the original removal action would allow the laying of sewer pipe through some of Site 15, the primary reason for conducting the removal action was to remove contaminated soil from a site that had flooded during heavy rains. Please note, the sewer project at Site 15 has not yet been implemented. Please change

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the statements to reflect the need to protect against migration of contaminants due to periodic flooding.

2. Page 2-90, Section 2.1.5, Sensitive Ecosystems

In order to help meet the last objective of the EE/CA, "Provide data that can be used to evaluate potential environmental impacts of the identified contaminated soil removal technology and identify methods to mitigate those impacts," please provide more information on the least tern colony. For example: the distance of the colony to the Site 15 TSTA, the distance of the colony to truck routes, and the dates of the tern's nesting period.

3. Page 2-9, Section 2.1.6, Meteorology

Please include the average wind speeds and direction for the months that the removal action will take place. Also describe the typical variation of wind speed and direction during the day. For example: "During the months of August and September the air is usually calm during the morning hours until 1:00 pm. At that time wind speed may gust to 15 mph out of the south west." This data should be available from the Naval Air Station control tower or the Oakland Airport.

4. Page 2-9, Section 2.2.1, Previous Removal Actions

The statement in this section about the reason for moving Site 15 soil to the TSTA is not accurate. Soil was moved to the TSTA in order to protect public health and the environment from an uncontrolled contaminated site. The cleanup of the site had been delayed because the demonstration to treat Site 15 soil failed. The contamination at Site 15 was at the surface and the site had flooded the previous year. The sewer system through Site 15 has yet to be constructed. Please change this section to reflect this.

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5. Page 2-10, Section 2.3, TSTA Stockpile
Characterization

This section states that Table 2-1 summarizes the analytical results of the Soluble Threshold Limit Concentrations (STLC) tests. Table 2-1 reports average concentration of Lead and PCB at the TSTA. The STLC, or California Waste Extraction Test, for Site 15 soil is reported in Appendix 1, Table A-3. We would prefer that this table be repeated and explained in Section 2.

6. Page 3-1, Section 3.1, Statutory Framework

There is no FFA (Federal Facility Agreement) for NAS Alameda. A draft Federal Facility Site Remediation Agreement (FFSRA) was written in 1993; however, it was never finalized and signed.

7. Page 3-2, Section 3.4, Applicable or Relevant and
Appropriate Requirements.

This section should not only list and describe Applicable, Relevant and Appropriate Requirements (ARARs) it should also specifically state how the ARAR applies to this removal action, what is required by the ARAR, and how the removal action will comply with the ARAR. Discussing potential ARARs for non-selected alternative is not necessary. Appendix B of Site 16 EE/CA contains much of this information and is presented in a format clearer than that found in Section 3.4.

8. Page 3-5, Section 3.4, Applicable and Relevant
ARARs

ARARs should be described in three separate sections such as: Applicable Requirements; Relevant and Appropriate Requirements; and To Be Considered Requirements. The ARAR discussion should be limited to the selected alternative: Off-Site Disposal.

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9. Page 3-5, Section 3.4, CCR Title 22 Social Security, Division 4.5

Specific sections of California Code of Regulations, Title 22, Division 4.5 must be identified as Applicable Requirements. These sections include Chapter 11 (Identification and Listing of Hazardous Waste), Chapter 12 (Standards Applicable to Generators of Hazardous Waste), and Chapter 15.5 (Corrective Action Management Units - Closure requirements). These sections apply because, according to the Navy's waste analysis, hazardous waste are stored in the Temporary Storage and Treatment Facility (TSTA).

10. Page 3-6, Bay Area Air Quality Management District Regulations

The BAAQMD ARARS are a good example for the need to specify what is required by the ARAR and how the action will meet the ARAR. Regulation 6 specifies the maximum amount of particulate emissions acceptable. Regulation 11, Rule 1 identifies maximum lead emissions and monitoring requirements. Please provide more detail on these regulations including what requirements apply and how the action will meet them.

11. Page 3-6, California Health and Safety Code

the DTSC does not agree with the Navy's position that the laws of the State of California are merely To Be Considered. California Health and Safety Code, Sections 25356.1, 253558.1, and 25323.1 identify procedural requirements for conducting removal actions in the State of California. These laws are Applicable Requirements for any removal action conducted at a non-NPL site in the State of California. The document must be changed to reflect this.

12. Page 3-7, 40 CFR Part 264

This section states that this regulation is not

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directly applicable to the TSTA because the soil at the site is not a hazardous waste. Section 2.3 of the EE/CA stated that the soil in the stockpile was found to be hazardous based on the STLC. Please modify the document to reflect this.

13. Page 4-3, Table 4-1, general Removal Action and Technology Screening Summary TSTA (Soil from Site 15).

The comment for Removal/Disposal Action, On-Site Backfill was stated as community resistance; this is not accurate. The main problem with this alternative are the unanswered technical questions surrounding on-site disposal. This is due to the lack of a remedial investigation, feasibility study and Record of Decisions for the Site 2 landfill. Please change this comment.

14. Appendix 1, TSTA Stockpile Characterization and Table A-3

This Section reports that Soil Stockpile 1 was found to have an average solubility of lead of 5 mg/L (mg/L is the proper unit for reporting liquid concentrations). Because Table A-3 does not identify which soil pile a sample was taken from, we can not follow the Navy's calculations. We assume that samples 121-S15-001 and 002 were taken from Soil Stockpile 1. We therefore calculate an average concentration of soluble lead in Soil Stockpile 1 as 6 mg/L. Please provide the information in Table A-3 that will allow the reader to understand the calculations of average soluble lead in the soil stockpiles.

Site 16 draft EE/CA

1. Page 2-7, Section 2.1.6 Sensitive Ecosystems

In order to help meet the last objective of the EE/CA, "Provide data that can be used to evaluate potential environmental impacts of the identified

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contaminated soil removal technology and indentify methods to mitigate those impacts," please provide more information on the least tern colony. For example: the distance of the colony to the Site 16, the distance of the colony to truck routes, and the dates of the tern's nesting period.

2. Page 2-17, Section 2.4 Analytical Data

This section does not include a waste analysis of the Site 16 soil. Without a waste analysis we can not determine if the soil is a hazardous waste. This determination is needed to establish ARARs. Please include the data from the waste analysis, or a plan for obtaining the waste analysis.

3. Page 3-2, Section 3.4, Applicable or Relevant and Appropriate Requirements

This section should not only list and describe Applicable, Relevant and Appropriate Requirements (ARARs) it should also specifically state how the ARAR applies to this removal action, what is required by the ARAR, and how the removal action will comply with the ARAR. Discussing potential ARARS for non-selected alternative is not necessary. Appendix B of Site 16 EE/CA contains much of this information and is presented in a format clearer than that found in Section 3.4. Appendix B, however, should be modified to include information requested above.

4. Page 3-5, Section 3.4, Applicable and Relevant ARARs

ARARs should be described in three separate sections such as: Applicable Requirements; Relevant and Appropriate Requirements; and To Be Considered Requirements. The ARAR discussion should be limited to the selected alternative: Off-Site Disposal.

5. Page 3-5, Section 3.4, CCR Title 22 Social

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Security, Division 4.5

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8. Page 4-3, Table 4-1, General Removal Action and Technology Screening Summary Site 16 - CANS - 2 Area.

The comment for Removal/Disposal Action, On-Site

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Backfill was stated as community resistance; this is not accurate. The main problem with this alternative are the unanswered technical questions surrounding on-site disposal. This is due to the lack of a remedial investigation, feasibility study and Record of Decisions for the Site 2 landfill. Please change this comment.

If you have any questions on these comments, please call me at (510) 540-3809.

Sincerely,



Thomas P. Lanphar
Project Manager
Base Closure Branch

cc: See next page.

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