



Terry Tamminen  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

Edwin F. Lowry, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200

N00236.001755  
ALAMEDA POINT  
SSIC NO. 5090.3



Arnold Schwarzenegger  
Governor

December 3, 2003

Mr. Luciano A. Ocampo, PE  
Remedial Project Manager  
Department of the Navy  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

RERA

2003 DEC -9 A 11: 23

ERAC OFFICE

### **NOTICE OF DEFICIENCY, DRAFT PART 1: AMENDMENT TO THE CLOSURE PLAN AND PART II: SAMPLING AND ANALYSIS PLAN, INDUSTRIAL WASTE TREATMENT PLANTS (IWTP) 360, NAVAL AIR STATION ALAMEDA, ALAMEDA, CALIFORNIA - EPA ID # CA 2 170 023 236**

Dear Mr. Ocampo:

The Department of Toxic Substances Control (DTSC) received the Draft Closure Plan and Sampling and Analysis Plan described above for the closure of the Industrial Waste Treatment Plant (IWTP) 360 dated September 11, 2003. Enclosed please find comments regarding the proposed plans offered by the DTSC Geological Support Unit (GSU) for your review.

Please address the GSU comments in a Revised Part I and Part II document and submit to DTSC by January 5, 2004. If you have any questions or comments concerning this letter please contact Mr. Dean Wright of my staff at (916) 255-6528.

Sincerely,

Wei Wei Chui, Section Chief  
Standardized Permitting and Corrective Action Branch

cc: Next page

Mr. Luciano A. Ocampo  
December 3, 2003  
Page 2

cc: Ms. Beth Kelly  
Project Manager  
Tetra Tech EM Inc.  
10670 White Rock Road, Suite 100  
Rancho Cordova, California 92101

Dean Wright, R.G.  
Standardized Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, California 95826

Norman Shopay, R.G.  
Geology, Permitting and Corrective Action Branch  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710

DIANE SILVA  
ADMIN RECORD

3 COPIES

12/10/03



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

## Department of Toxic Substances Control

---

Edwin F. Lowry, Director  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721



Gray Davis  
Governor

### MEMORANDUM

TO: Dean Wright, RG  
Engineering Geologist  
Permitting and Corrective Action Branch  
Sacramento Regional Office

FROM: Norman Shopay, RG *NS*  
Engineering Geologist, Northern California Geological Services Unit  
Geology, Permitting and Corrective Action Branch  
Berkeley Regional Office

CONCUR: Brian Lewis, CEG, CHG *NS G: BL*  
Engineering Geologist Supervisor I, Northern California Geological  
Services Unit  
Geology, Permitting and Corrective Action Branch  
Sacramento Regional Office

DATE: November 12, 2003

SUBJECT: Review of Amendment to the Closure Plan and Sampling and Analysis  
Plan, Industrial Waste Treatment Plant 360, Alameda Point, Alameda,  
Alameda County, California  
Project No. 25045-2000004-33PER

---

### DOCUMENT REVIEWED

*Industrial Waste Treatment Plant 360, Part I: Amendment to the Closure Plan and Part II: Sampling and Analysis Plan, Point, Alameda California, dated September 11, 2003, prepared by Tetra Tech, Inc. (Closure Plan)*

### INTRODUCTION

As you have requested, the Geological Services Unit (GSU) has reviewed the above-referenced Closure Plan. This memorandum provides our comments and recommendations. If you have any questions, please contact Norman Shopay at (510) 540-3943 or Brian Lewis at (916) 255-6532.

### COMMENTS

The following our GSU's comments.

- GSU recommends additional clarification regarding the closure performance standards referenced in Part I, Section 8.0 and Part II, Section 1.1.8 and the use of Environmental Protection Agency (EPA) Preliminary Remediation Goals (PRGs) as initial screening levels. GSU understands that closure performance standards are either non-detectable concentrations, background concentrations or health-based risk levels. In the case of cadmium and chromium or other metals in soil and groundwater the closure performance standard should be background. Levels exceeding background concentrations would then required a health risk assessment and risk management decision.
- The document states that cadmium and chromium were established as the constituents of concern for the additional sampling based on the results of soil sampling collected in 1996 and 2000. GSU believes it would not be appropriate to exclude other metals based on comparisons of metal concentrations to PRGs as observed on Tables 5-1, 5-2 and 5-3. All metals should be compared to background concentrations. Metals that are above background concentrations are carried forward to a risk assessment. Therefore, it may be appropriate to analyze the full range of Title 22 metals including hexavalent chromium as well as other appropriate constituents listed on Table 3-3 of the closure plan for any proposed sampling.
- Section 3.6, Part 1 describes flushing of the remaining IWTP pipelines. It is not clear to GSU if the pipeline is considered to be appropriately decontaminated and closed.
- Please provide the rationale for selecting and obtaining soil samples at only 2 and 8 feet below ground surface (bgs). Please describe the rationale for proposing only two boring locations east of the previous excavation area. Please describe why soil sampling can not be conducted inside building 414. Please indicate in Figure 4, Part II the direction of groundwater flow in support of the proposed downgradient groundwater sampling locations.
- Proposed laboratory reporting limits described in Part II, Section 1.3.2.6 and Appendix D should not be based on comparisons to PRGs.
- A minimum of five working day notice should be provided to DTSC prior to commencing any field activities.
- If requested by DTSC, the facility should collect, preserve and transport duplicate or concurrent soil and groundwater samples for analysis at DTSC Hazardous Materials Laboratory (HML).