

**ACTION MEMORANDUM  
FOR TIME-CRITICAL REMOVAL OF PESTICIDE STORAGE SHED AND  
DIELDRIN-CONTAMINATED SOIL AT BUILDING 195  
ALAMEDA POINT  
ALAMEDA, CALIFORNIA**

**Environmental Remedial Action  
Contract Number N62474-98-D-2076  
Contract Task Order 0013**

**Document Control Number 1802  
Revision 0**

**August 14, 2001**

**Submitted to:**

**U. S. Department of the Navy  
Southwest Division  
Naval Facilities Engineering Command  
Environmental Division  
1220 Pacific Highway  
San Diego, California 92132-5190**

**Submitted by:**

**IT Corporation  
4005 Port Chicago Highway  
Concord, California 94520-1120**



**IT CORPORATION**  
*A Member of The IT Group*

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 Michelle Crook. 02R1.MC  
 1230 Columbia St., Suite 1100  
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**FROM:** *Dan Shafer*  
 Dan Shafer  
 Project Manager

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REVISION 1

ACTION MEMORANDUM FOR TIME-CRITICAL  
REMOVAL OF PESTICIDE STORAGE SHED  
AND DIELDRIN-CONTAMINATED SOIL

DATED 03 OCTOBER 2001

IS ENTERED IN THE DATABASE AND FILED AT  
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## Acronyms and Abbreviations

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ARAR	Applicable or Relevant and Appropriate Requirement
bgs	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CLP	Contract Laboratory Program
DTSC	California Department of Toxic Substances Control
EBS	Environmental Baseline Survey
EE/CA	Engineering Evaluation/Cost Analysis
EPA	U.S. Environmental Protection Agency
HDPE	high-density polyethylene
mg/kg	milligram(s) per kilogram
Navy	U.S. Department of the Navy
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
PCB	polychlorinated biphenyl
PRG	Preliminary Remediation Goal
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
TPH	total petroleum hydrocarbons

## **Removal Action Approval**

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As detailed in Section 3.0 of this document, Building 195 (which is covered with peeling lead-based paint) and dieldrin-contaminated soil at Building 195 within Parcel 98 at Alameda Point, Alameda, California, pose a threat that met the National Oil and Hazardous Substances Pollution Contingency Plan criteria for a time-critical removal action. Because of the need for immediate action at the site, the Navy intends to conduct excavation and off-site disposal of contaminated soil and dismantling/disposal of the shed. Dismantling/disposal of the shed and excavation and off-site disposal of the contaminated soil most efficiently met all removal objectives and resulted in the most rapid reduction in risk. As documented by the signature below, the Navy approved of the proposed excavation and off-site disposal of the contaminated soil and shed.

BRAC Environmental Coordinator:

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Michael E. McClelland, P.E.  
Southwest Division  
Naval Facilities Engineering Command

## **1.0 Introduction and Purpose**

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Building 195 is located within the boundaries of Parcel 98, which is located west of Main Street in the northeastern part of Alameda Point. Parcel 98 has been utilized for military family housing purposes since the early days of base operation (approximately 1940) until base closure. Building 195 is part of the landscape maintenance yard located in the south central portion of Parcel 98 and served as a storage shed for fertilizers and pesticides. Elevated concentrations of dieldrin were detected in two soil samples located near the west wall of the pesticide storage shed (Building 195). Dieldrin has been detected in soil samples in concentrations exceeding the established 2000 U.S. Environmental Protection Agency (EPA) residential Preliminary Remediation Goal (PRG) of 0.03 milligrams per kilogram (mg/kg). In addition to the dieldrin-contaminated soil. Building 195 (pesticide storage shed) is covered with lead-based paint, which is peeling over most of the structure. Analysis of a paint chip sample resulted in a concentration of lead exceeding 87,000 mg/kg. Therefore, the U.S. Department of the Navy (Navy) decided to perform a removal action to eliminate the potential for human exposure. Verbal approval for the removal action was given by the EPA, the Department of Toxic Substances Control (DTSC), and the Regional Water Quality Control Board (RWQCB) on April 17, 2001.

The presence of lead-based paint on the shed and elevated dieldrin concentrations in the soil at the site posed a potential threat to human health and the environment as defined in Section 300.415(b)(2)i, of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The Navy determined that immediate removal of the shed and dieldrin-contaminated soil could prevent potential future human exposure to the compounds.

This document provides notification of and documents approval of the removal action for the pesticide storage shed (Building 195) and dieldrin-contaminated soil around Building 195. Specifically, this document discusses the site conditions and background, threats to public health and welfare or the environment, endangerment determination, proposed action and estimated cost, outstanding policy issues, enforcement, and recommendations.

## **2.0 Site Conditions and Background**

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This section presents the site location and description, site characteristics, releases or threatened releases into the environment of a hazardous substance or contaminant, the site's National Priorities List (NPL) status, other actions taken at the site to date, and the role of state and local authorities at the site.

### **2.1 Site Location and Description**

Building 195 is located within the boundaries of Parcel 98 in the northeastern portion of Alameda Point. Alameda Point, the former Naval Air Station, is located at the western end of Alameda Island. Alameda Island is on the eastern shore of San Francisco Bay, adjacent to the City of Oakland. Alameda Point occupies approximately 2,634 acres (both on shore and off shore), and is approximately 2 miles long by 1 mile wide.

Building 195 is located in the maintenance yard in the south central portion of Parcel 98 (Figure 1). Building 195 was utilized as a storage shed for fertilizers and pesticides. The building is a Quonset Hut design and is constructed of painted corrugated steel with a composite board interior lining and an earthen floor. The building covers an area of approximately 860 square feet.

### **2.2 Site Characteristics**

Soil samples collected from the two locations west of Building 195 contained dieldrin at concentrations greater than the EPA residential PRG of 0.03 mg/kg (Figure 2). Dieldrin was detected in two samples collected from 0.5 to 1.0 feet below ground surface (bgs) at concentrations ranging from 0.089 to 0.75 mg/kg. Additional soil sampling in the vicinity of Building 195 suggests that soil containing dieldrin in concentrations exceeding the residential PRG appears to be limited to the area immediately west of Building 195.

The paint covering the surface of Building 195 was observed to be peeling over most of the structure. Analysis of a paint chip sample collected from the building resulted in a lead concentration exceeding 87,000 mg/kg, which confirmed the suspicion that the paint was lead based.

### **2.3 Release or Threatened Release of a Hazardous Substance or Contaminant**

Within the military family housing area, landscaping and lawn maintenance were conducted by military and civilian personnel. Building 195 is located within a landscape maintenance yard in

the south-central portion of the family housing area (Parcel 98) and was used as a storage shed for pesticides and fertilizers. It is believed that dieldrin contamination present in the soil at Building 195 is the result of small surface spills of pesticides. This is consistent with the contaminant distribution. Additionally, the presence of lead-based paint on the exterior surface of Building 195 presents the threatened release of lead to the soil surrounding the building.

Parcel 98 is designated for future use as residential housing. The area of Parcel 98 containing the pesticide storage shed is proposed to be used for construction of nurseries to raise home-grown produce. Potential exposure pathways to the lead and dieldrin include direct ingestion, inhalation, and dermal contact leading to accidental ingestion. Since this area of Parcel 98 is to be used for growing home-grown produce, the most likely exposure pathway is believed to be accidental and direct ingestion.

## **2.4 National Priorities List Status**

Alameda Point was added to the NPL in July 2000. The listing was the result of a hazard ranking system evaluation performed by the EPA.

## **2.5 Other Actions to Date**

Previous actions at Building 195 include site characterization sampling activities during the Environmental Baseline Survey (EBS) program. Current actions include time-critical removal activities at the site. This section summarizes previous and current actions.

### **2.5.1 Previous Actions**

Soil sampling at Parcel 98 began with the Phase 2A EBS in 1994 and 1995. Surface soil samples were collected at several locations within Parcel 98 and analyzed for Contract Laboratory Program (CLP) Pesticides/polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPH). Sampling locations were selected to target several areas, including Building 195, the Maintenance Yard, Landscaped Areas between housing units, and filled wetlands. As previously stated, dieldrin was present at elevated levels in two samples in the vicinity of Building 195. Also, motor oil-range petroleum hydrocarbons were detected in the surface soil samples in the vicinity of Building 195.

Phase 2B EBS sampling was performed in 1995. Surface and subsurface soil samples were collected from locations within the Maintenance Yard and in the vicinity of Building 195 in order to more completely delineate the extent of contamination observed in the Phase 2A samples. Phase 2B samples were analyzed for CLP Pesticides/PCBs and TPH. No compounds were detected in concentrations exceeding PRGs. Analytical results indicated that although low

levels of pesticides (4,4'-DDD, 4,4'-DDE, and 4,4'-DDT) were present in soil within the Maintenance Yard, the areal extent of soil with elevated dieldrin appears to be limited to the area on the western side of Building 195.

### **2.5.2 Current Actions**

Current actions at Building 195 include the proposed time-critical removal activities associated with the pesticide storage shed and dieldrin-contaminated soil.

### **2.6 State and Local Authorities' Roles**

Building 195 and Parcel 98 are part of a federal facility. Section 120(f) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requires that the Navy give appropriate state and local officials the opportunity to participate in planning and selection of remedial actions at Navy facilities. The EPA, DTSC, and RWQCB are currently the regulatory agencies for CERCLA activities at Alameda Point, and are reviewing and commenting on the Navy's CERCLA response activities at Alameda Point. As stated previously, the Navy has received verbal approval for this removal action from the EPA, DTSC, and RWQCB.

### **3.0 Threats to Public Health and Welfare and the Environment**

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Based upon the presence of lead-based paint and elevated concentrations of dieldrin in soils, the Navy determined that Building 195 posed a potential threat to public health and welfare and the environment and that a time-critical removal action pursuant to CERCLA Section 104(a) was appropriate to mitigate these threats. The potential threats are discussed below.

#### **3.1 Threats to Public Health and Welfare**

Dieldrin was detected in two soil samples at concentrations up to 0.75 mg/kg in soil samples collected from within and adjacent to Building 195. Analysis of peeling lead-based paint from the exterior surface of Building 195 resulted in a lead concentration exceeding 87,000 mg/kg. The removal action is intended to reduce the threat to public health and welfare that could result when dieldrin and lead are present at concentrations that could result in greater than  $10^{-4}$  increased lifetime cancer risk. The following threat to public health and welfare as defined in NCP Sections 300.415(b)(2)i is present at Building 195:

**Actual or potential exposure of nearby human populations to hazardous substances, pollutants, or contaminants.** People residing, working, or playing at the site may be exposed to soil contaminated with dieldrin and lead through direct contact or incidental ingestion. Dieldrin and lead are hazardous substances known to pose a threat to human health.

#### **3.2 Threats to the Environment**

The quality of wildlife habitat at Building 195/Parcel 98 makes it unlikely that any terrestrial receptors were threatened by the contamination. Constant human use of the area has reduced the use of the area as habitat for most wildlife.

## **4.0 Endangerment Determination**

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Human exposure to dieldrin and lead through direct contact with or incidental ingestion of contaminated soil poses a potential threat to public health and welfare if the removal action described in this document had not been implemented.

## **5.0 Removal Action and Estimated Cost**

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This section describes the removal action for contaminated soil at Building 195. It also provides an explanation of why an engineering evaluation/cost analysis (EE/CA) was not performed, discusses applicable or relevant and appropriate requirements (ARARs), and discusses the estimated cost of the removal action.

### **5.1 Description of Removal Action**

The removal action will consist of the following tasks:

- Pre-excavation soil and groundwater sampling
- Lead-based paint removal and demolition of Building 195
- Excavation of impacted soils
- Post-excavation confirmatory sampling
- Backfilling and site restoration

Fieldwork is expected to begin in mid-August to mid-September and be completed by October 31, 2001.

#### ***Pre-Excavation Soil and Groundwater Sampling***

Prior to excavation activities, surface soil samples will be collected from 12 locations and subsurface soils at 2 locations to delineate the horizontal and vertical extent of elevated dieldrin concentrations in the area west of Building 195 and to determine if the soil has been impacted by lead from peeling lead-based paint. Soil samples will also be analyzed for PCBs to determine if they are present at elevated concentrations. To delineate the extent of lead potentially present in surface soil, surface soil samples will be collected along the north, east, and south sides of Building 195 and analyzed for lead. Soil sampling locations are presented in Figure 3. The excavation limits will be defined by the analytical results of these samples. Areas where dieldrin is observed in concentrations exceeding its PRG of 0.03 mg/kg will be excavated; soil with concentrations of lead exceeding 209 mg/kg (as derived using DTSC's Leadsread Model [Version 7]) will also be excavated.

#### ***Lead-based Paint Removal and Demolition of Building 195***

Building demolition will include the removal of the building interior shell, the removal of any loose and peeling paint from the panels, and disassembly of the exterior of Building 195. The paint on the corrugated steel panels, which form the exterior of the structure, is peeling over significant areas. During building demolition, the loose and peeling lead-based paint will be

removed by qualified lead removal workers. Appropriate measures will be taken during the lead removal to prevent introduction of lead-bearing paint chips into the soil or atmosphere. The lead-containing materials will be containerized and disposed of at an appropriate disposal facility. Building debris not associated with lead-based paint will be removed and containerized for disposal as municipal waste. The corrugated steel panels removed from the building will be stacked on suitable high-density polyethylene (HDPE) liners or placed in scrap material containers until transported to an appropriate disposal/recycling facility.

### ***Soil Excavation***

The approximate area to be excavated west of Building 195 is illustrated in Figure 3. Based on existing analytical data, it is expected that the area to be excavated to a depth of 2 feet bgs in an area measuring approximately 18 feet by 28 feet. If elevated concentrations of lead are observed in the surface soil samples collected from the north, east, or south sides of Building 195, soil will be excavated from the building wall to the distance from the building indicated by the analytical results. Soil in these areas will be excavated to a depth of 1 foot bgs. Soil will be excavated with a backhoe, and placed directly into 20-yard roll-off dumpsters, covered, and temporarily stored on site. Samples will be collected, sufficient to characterize the excavated soil for disposal.

Removal action activities are not expected to intercept groundwater. Once characterized, the excavated soil will be transported off site to an approved facility for proper disposal. Based on the expected dimensions of the excavation, it is estimated that approximately 37 cubic yards of soil will be removed.

### ***Post-Excavation Confirmatory Soil Sampling***

After completion of excavation activities, a series of post-excavation confirmatory soil samples will be collected to verify that the soil containing elevated pesticides and lead has been effectively removed. At the excavation on the western side of Building 195, samples will be collected from each of the four sidewalls and from two locations on the floor of the excavation. These samples will be analyzed for pesticides, PCBs, and lead. If excavations are required on the north, east, or south sides of Building 195 due to elevated lead concentrations, a composite sample will be collected from the floor of the excavation from each side of the building that is excavated. These samples will be analyzed for lead only.

### ***Backfilling and Site Restoration***

Following the completion of excavation activities, the bottom of the excavation will be covered with a commercially available colored barrier fence, an HDPE liner or other suitable material to

mark the bottom of the excavation. Clean imported fill and/or crushed rock material to identify excavation limits. Common borrow material will be used to backfill the excavation. The backfill will be compacted and recontoured to original grade.

## **5.2 Engineering Evaluation/Cost Analysis**

An EE/CA was not conducted due to the time-critical nature of this removal action (see Title 40 of the Code of Federal Regulations (40 CFR), 300.415[b][4]). The estimated cost of the removal action is discussed in Section 5.5.

## **5.3 Applicable or Relevant and Appropriate Requirements**

The purpose of conducting the removal action is to reduce risks to human health by removing lead and dieldrin-contaminated soil from the vicinity of Building 195. The removal of soil in which lead and dieldrin exceed their respective PRG will eliminate the potential exposure pathway at Building 195.

The Federal Superfund Amendments and Reauthorization Act of 1986 (SARA) requires consideration of ARARs for removal actions at a site. Applicable requirements are promulgated federal or state standards that specifically address a hazardous constituent, removal action, location, or other conditions at a site. Relevant and appropriate requirements are promulgated federal or state requirements that address problems or situations sufficiently similar to those encountered at a hazardous waste site; these requirements may or may not be directly related to the circumstances at a CERCLA site. ARARs considered for the Building 195 soil removal action are summarized in Table 1.

## **5.4 Project Schedule**

The removal action will begin in mid-August to mid-September and is anticipated to be completed by October 31, 2001.

## **5.5 Estimated Cost**

The cost of the removal action is approximately \$160,000, which includes physical restoration of the site.

## **6.0 Expected Changes in the Situation Should Action Be Delayed or Not Taken**

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If the removal action is not implemented, the lead and dieldrin present in the soil would continue to pose a risk to people residing or working in the vicinity of Building 195.

## **7.0 Outstanding Policy Issues**

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No outstanding policy issues are associated with Building 195.

## **8.0 Enforcement**

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EPA is the enforcement agency for the site.

## **9.0 Conclusion**

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The Navy will conduct the time-critical removal action of contaminated soil at Building 195 to reduce potential site-related risks.

## FIGURES

DRAWING NUMBER 807181-B23

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OFFICE

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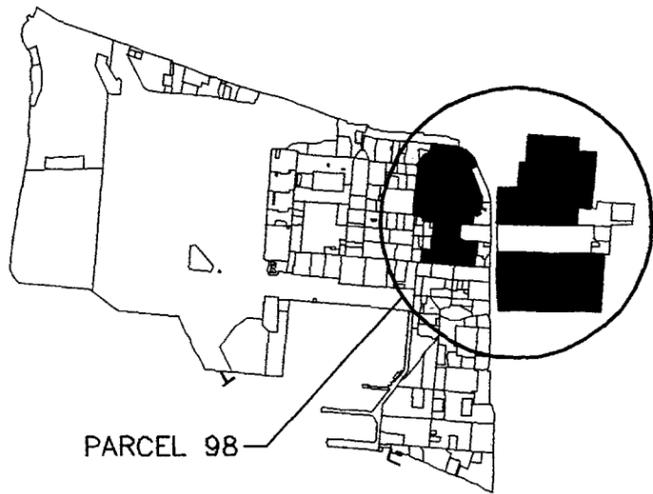
IMAGE

3-28-01

CONCORD

BU

FORMAT REVISION 2/26/99



PARCEL 98

KEY PLAN

REMOVAL ACTION SITE

BUILDING 195

LEGEND

98

PARCEL NAME



PARCEL BOUNDARY



SUBSURFACE SOIL SAMPLE



SURFACE SOIL SAMPLE

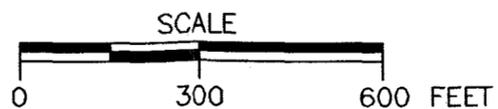
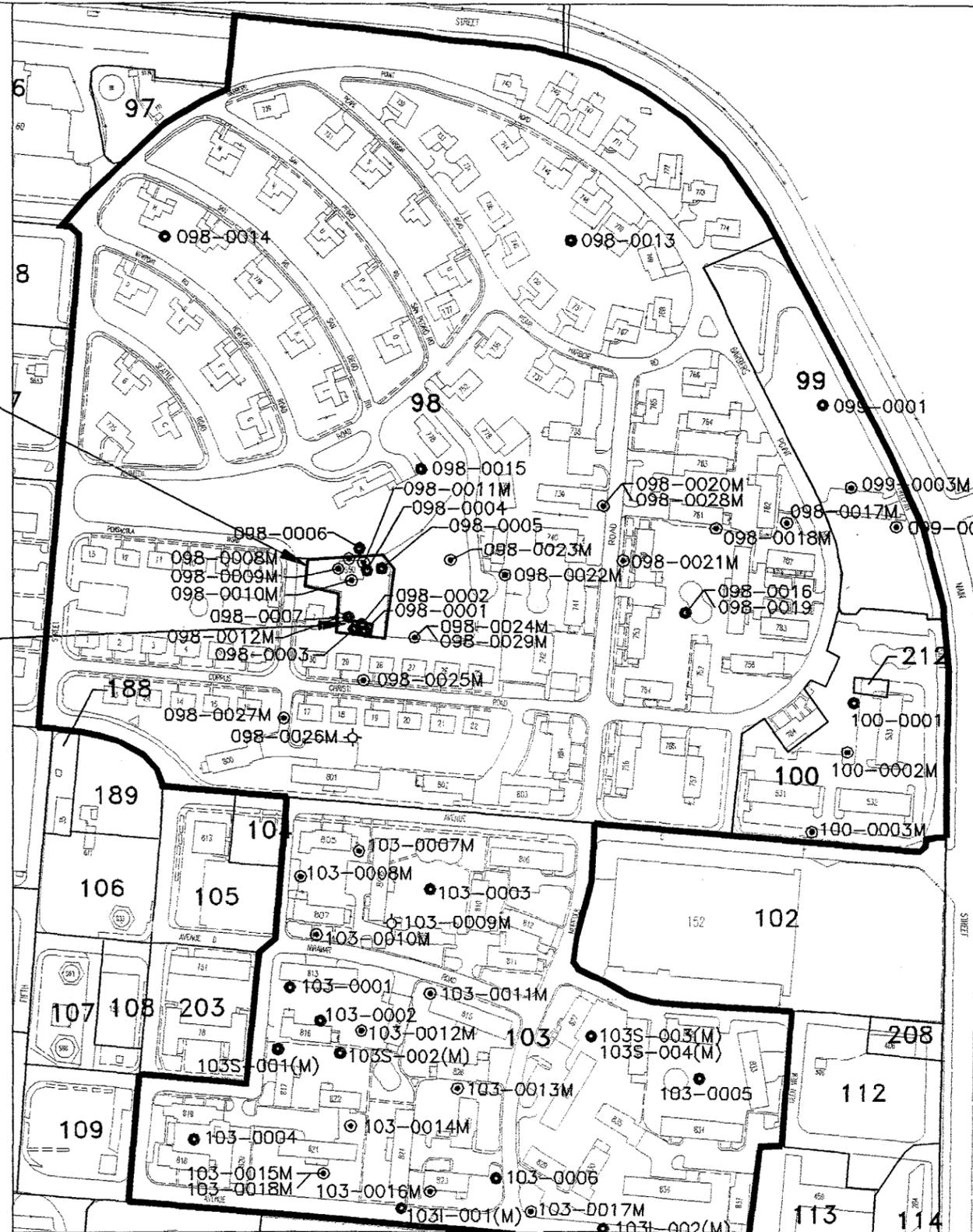


SOIL GAS SAMPLE



AIR SAMPLE

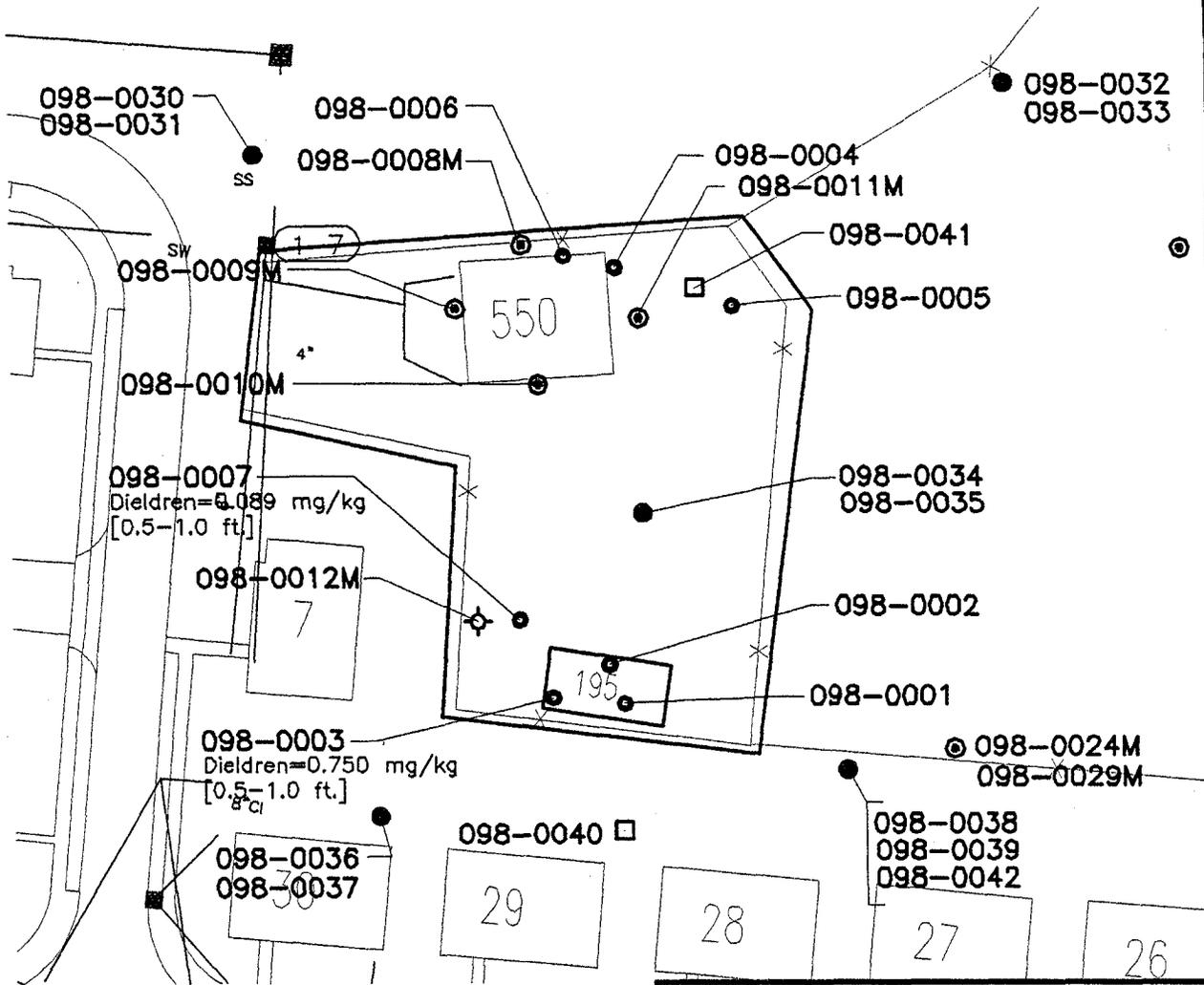
000-0000(M) CONFIRMATION AND SCREENING SAMPLE TAKEN



DEPARTMENT OF THE NAVY  
NEW FACILITIES COMMAND  
SOUTHWEST DIVISION  
SAN DIEGO, CALIFORNIA

FIGURE 1  
LANDSCAPE MAINTENANCE AREA  
LOCATION MAP  
ALAMEDA POINT  
ALAMEDA, CALIFORNIA

IMAGE	X-REF	OFFICE	DRAWN	CHECKED BY	APPROVED BY	DRAWING NUMBER
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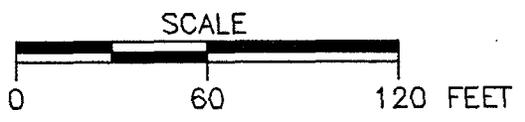


**GENERAL LEGEND**

- PARCEL OUTLINE
- SURFACE AND SUBSURFACE SOIL SAMPLE
- 2 ⊙ SUBSURFACE SOIL SAMPLE & NO.
- 6 ● SURFACE SOIL SAMPLE & NO.
- 8 ⊙ SOIL GAS SAMPLE & NO.
- 10 ■ SANITARY SEWER MANHOLE NO.
- SW — SANITARY SEWER LINE
- 12A-1 STORM DRAIN MANHOLE & NO.
- CATCH BASIN
- SS — STORM SEWER LINE

1. ALL SANITARY SEWERS ARE VITRIFIED CLAY PIPE UNLESS NOTED OTHERWISE.

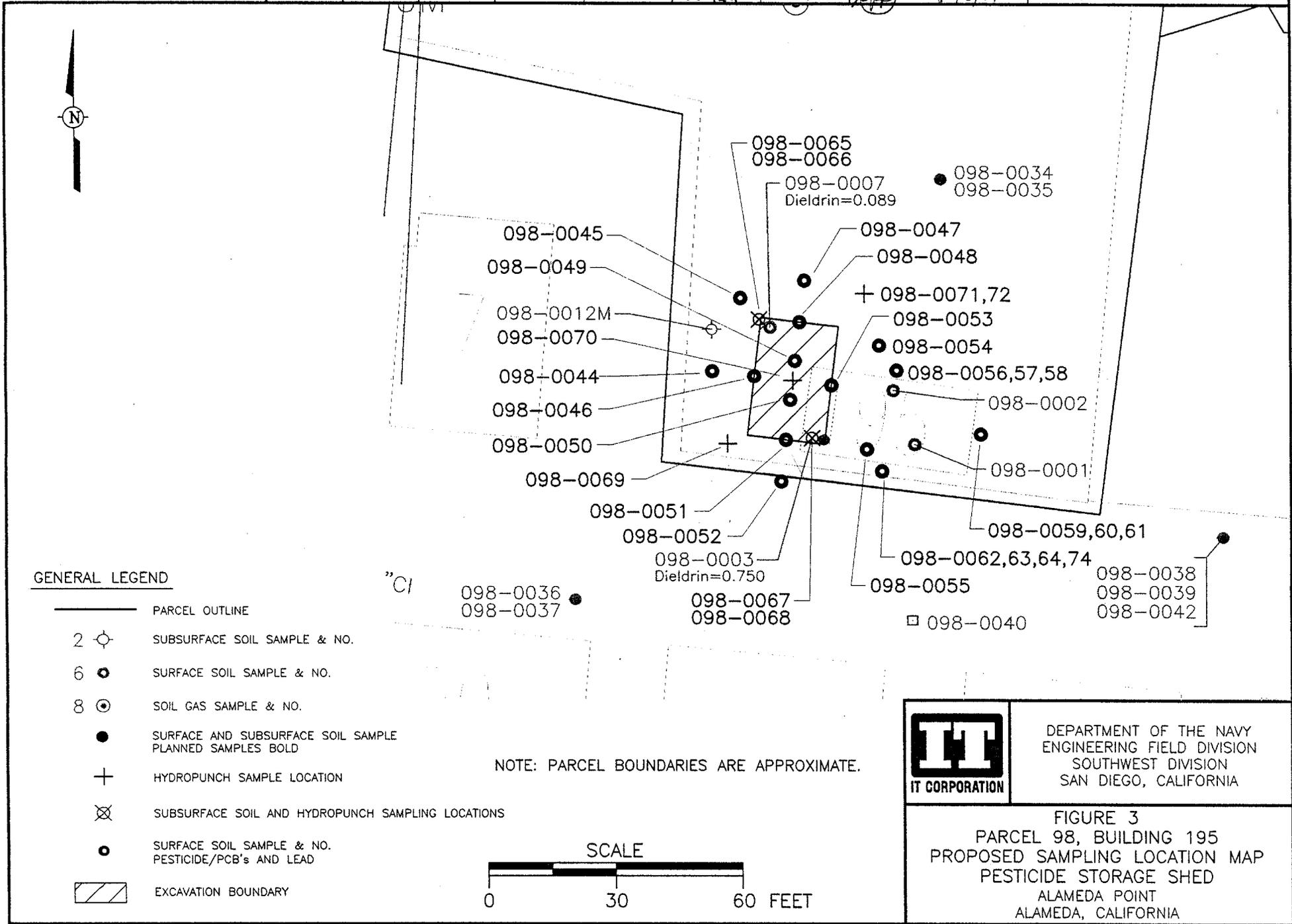
NOTE: PARCEL BOUNDARIES ARE APPROXIMATE.



DEPARTMENT OF THE NAVY  
ENGINEERING FIELD DIVISION  
SOUTHWEST DIVISION  
SAN DIEGO, CALIFORNIA

**FIGURE 2**  
PARCEL 98, BUILDING 195  
PREVIOUS SAMPLE LOCATION  
AND PESTICIDE EXCEEDANCE MAP  
PESTICIDE STORAGE SHED  
ALAMEDA POINT ALAMEDA, CALIFORNIA

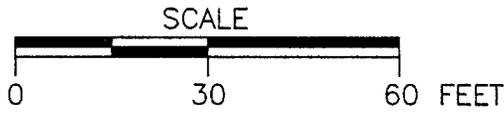
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**GENERAL LEGEND**

- PARCEL OUTLINE
- 2 ⊕ SUBSURFACE SOIL SAMPLE & NO.
- 6 ● SURFACE SOIL SAMPLE & NO.
- 8 ⊙ SOIL GAS SAMPLE & NO.
- SURFACE AND SUBSURFACE SOIL SAMPLE  
PLANNED SAMPLES BOLD
- + HYDROPUNCH SAMPLE LOCATION
- ⊗ SUBSURFACE SOIL AND HYDROPUNCH SAMPLING LOCATIONS
- SURFACE SOIL SAMPLE & NO.  
PESTICIDE/PCB's AND LEAD
- ▨ EXCAVATION BOUNDARY

NOTE: PARCEL BOUNDARIES ARE APPROXIMATE.



	DEPARTMENT OF THE NAVY ENGINEERING FIELD DIVISION SOUTHWEST DIVISION SAN DIEGO, CALIFORNIA
	<b>FIGURE 3</b> PARCEL 98, BUILDING 195 PROPOSED SAMPLING LOCATION MAP PESTICIDE STORAGE SHED ALAMEDA POINT ALAMEDA, CALIFORNIA

## TABLES

**Table 1**  
**Applicable or Relevant and Appropriate Requirements for Soil Removal at Building 195**

Citation	ARAR Classification	Description	Comments
Coastal Management Zone Act; 16USC 1456(c)(1)(A); 15CFR 930	Relevant and appropriate	Requires federal agencies to conduct activities affecting the coastal zone consistent to the maximum extent practicable with approved state management programs.	Building 195 is not located within the coastal zone, but active removal activities at the facility may affect land or water use, or natural resources of the coastal zone at adjacent facilities.
McAteer-Petris Act (California Government Code Section 66600 and following sections)	Relevant and appropriate	The state management program for San Francisco Bay is contained in the Bay Conservation and Development Plan, enacted pursuant to the McAteer-Petris Act of 1965. It establishes requirements for prescribed activities affecting San Francisco Bay.	Building 195 is not located within the coastal zone, but active removal activities at the facility may affect land or water use, or natural resources of the coastal zone at adjacent facilities.
California Water Pollution Prohibition Act (California Fish and Game Code Section 5650)	Relevant and appropriate	Prohibits the deposition, directly or indirectly, of any substance or material that is deleterious to fish, plant, or bird life into waters of the state.	Relevant to protect fish, plants, or birds that may use the Oakland Inner Harbor from contamination resulting from excavation and treatment activities.
22 CCR Sections 66261.10 and 66261.24(a)(1)	Applicable	Establishes criteria for identifying hazardous waste.	The requirements will apply to characterize the excavated soil to determine whether it must be managed as hazardous waste.
22 CCR Sections 66262.1, 66262.11, 66262.20, 66262.30, 66262.31, 66262.32, 66262.33, and 66262.34	Applicable	Establishes standards for generators of hazardous waste.	If excavated soil is hazardous waste, these requirements will apply to managing excavated soil prior to shipment off site.
22 CCR Section 66268.7(a)	Applicable	Sets requirements for testing excavated soil to see if it is restricted for land disposal.	This regulation requires generators to determine if treatment is required prior to land disposal.
22 CCR Section 66261.24(a)(2)	Applicable	Establishes criteria for identifying California hazardous waste.	This requirement applies to characterize excavated soil to determine if it is a California hazardous waste.
BAAQMD Regulation 6-301, 302, and 305	Applicable	Sets requirements for controlling particulate and visible emissions during excavation and transport.	These requirements may be applicable to excavation and handling of soils.
BAAQMD Regulation 8-40-301 and 8-40-303	Relevant and appropriate	Limits uncontrolled aeration of stockpiled soil.	These requirements are applicable to contaminated soil that are excavated and stockpiled.
23 CCR 2546	Relevant and appropriate	Requires precipitation and drainage controls to limit to the greatest extent possible, inundation, erosion, or other conditions affecting stockpiled soils.	These requirements are relevant and appropriate to stockpiles generated from excavation of soil if the soil must be managed as a hazardous waste.

CCR denotes California Code of Regulations.

BAAQMD denotes Bay Area Air Quality Management District.