

Arc Ecology

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Glenna M. Clark
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

October 14, 2002

RE: Draft Project Plans for the Removal Actions for Parcels 79, 98, 105, 106, and 107, Alameda Point, Alameda, CA

Dear Ms. Clark,

I have reviewed the above-referenced document and have the following questions and comments:

Water Tower and Radio Antenna Demolition

1. The suggestion to perform spot abatement on the structures before taking them apart is risky. At this height, there would be no way to control the dust and paint chips that will fall while being removed with hand-powered tools. A much safer method would be to paint over the areas where the metal will be cut, encapsulating the lead based paint and greatly reducing the amount of lead dust that will be created during the removal.

Cleanup Goals and Confirmation Sampling:

2. The site cleanup goal for lead is set at 199 mg/kg based on the results of the DTSC Lead Spread 7 model for the area. According to the Sampling and Analysis Plan (SAP), in order to verify that the backfill material is "clean", a sample will be taken and the results will be compared to the EPA Region 9 Preliminary Remediation Goals (PRGs). The PRG for lead in residential areas is listed in Table 3 as 400 mg/kg however the PRG has recently been changed to 150 mg/kg. Whether or not the Navy prefers to use the latest PRG as the standard for the backfilled soil, using the previous PRG of 400 mg/kg is counter-productive when the cleanup goal is 199 mg/kg.
The Region 9 PRG for cadmium has also changed from 9 mg/kg, which is the cleanup level given for the removal action, to 1.7 mg/kg. Will the cleanup goal change accordingly?
3. There is a contradiction between the SAP and the Work Plan (WP). Sections 2.3.1 and 3.1 of the SAP list lead, cadmium and chromium as the contaminants of concern. The sections in Chapter 5 of the WP that discuss confirmation sampling state that confirmation samples will verify that lead and chromium contamination have been removed. Please include cadmium in the appropriate sections of Chapter 5 in the WP.
4. It is difficult to visualize the confirmation sampling methods described in Section 3.1 of the SAP. It is unclear from where within each grid the samples will be taken. For example, will all of the sidewalls be tested as well as the floor of the excavation? At what depth they will be taken? Previously, when the concern was brought forward that

there were gaps in the sampling used to delineate excavation boundaries, the Navy assured that confirmation sampling would reveal surrounding areas that exceed cleanup goals. I am not confident that the current confirmation sampling methods will fill these gaps; a better explanation of the proposed method is required.

Site Management Activities/Environmental Protection Plan:

5. Site Security (Sec. 3.4.1) – What type of security will be provided on the weekend? Residents in the area, especially children, may be tempted to enter fenced areas on the weekends if there is not proper site security provided during off-work hours.
6. The additional details about the protection of residents are not provided in the Site Health and Safety Plan as promised in Section 3.4.2 of the WP. Specific details about how neighboring residents will be protected must be provided before work commences. Please consider conducting swipe testing on the windowsills of surrounding houses and buildings before and after sampling.
7. Section 6.2.2 -
 - A stop work provision needs to be included for windy conditions when wind speed is above 25 MPH.
 - Dust control measures are vague and should be elaborated upon to specify actions that will be taken daily to control dust during tower removal and soil excavation. Dry decontamination is not very reliable and can lead to the transport of dust off-site via vehicle tires. I strongly suggest that wet street sweeping occur every night to help mitigate dust.
8. Please specify what “applicable” noise standards are for this area.
9. Section 6.2.3, Stormwater Management: There is no mention of a cover for soil stockpiles.

I appreciate the opportunity to review and comment on this document. If you have any questions, please contact me at 415-495-1786.

Sincerely,



Lea Loizos
Staff Scientist

Cc: Anna-Marie Cook, US Environmental Protection Agency
Marsha Liao, Department of Toxic Substances Control
Judy Huang, Regional Water Quality Control Board
Michael McClelland, BRAC Environmental Coordinator
Michael John Torrey, RAB Community Co-Chair