



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

August 24, 2004

Mr. Thomas Macchiarella  
BRAC Operations, Code 06CA.TM  
Department of the Navy, Southwest Division  
Naval Facilities Engineering Command  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101

**RE: Regulatory Agencies's Review of the Proposed Plan for Site 15, Alameda Point**

Dear Mr. Macchiarella:

EPA has reviewed the Proposed Plan for Site 15, submitted by the Navy to the agencies on July 14, 2004, with comments due on September 13. The new font size and format make the Proposed Plan much easier to read than the October 2003 version. However, the following corrections need to be made in the Proposed Plan to make it suitable for release for public review:

1. The Proposed Plan has been written for a non-NPL site. Alameda Point was placed on the NPL in 1999 and all references to Draft Remedial Action Plan, RAP requirements and DTSC as lead regulatory oversight agency must be removed.
2. The date proposed for the public meeting is inappropriate. Most people will be occupied with holiday activities the week of December 20 and it is unsuitable to schedule a public meeting so close to observed holidays. Communication with the Navy since submittal of this Proposed Plan has indicated that the meeting will be moved up to before Thanksgiving, a change EPA supports.

In addition, these specific items should be addressed and appropriate revisions incorporated:

3. Page 2, last paragraph of non-boxed text, second sentence: Suggest changing the word "has" to "had".
4. Page 3, second paragraph: Suggest adding a better description of the wetland habitat, i.e. that it is a narrow 20 foot wide section between the Site 15 fence and the riprap. A description is given later in the Proposed Plan, but too late to be useful. Also, there is an additional two spaces between the words "at" and "a" in the second sentence.
5. Page 4, first paragraph under title "Overview of Remedial Investigation Results". The conclusions should be presented right up front in this paragraph rather than having to

read through all the subsequent information to reach the conclusions at the very end.

6. Page 4, Environmental Investigations: The removal action in 1998 should be mentioned before the follow on data gap sampling of 2001. Also, were soil gas samples really taken at Site 15? There is no groundwater contamination or VOC contamination in soil, so it does not seem likely that soil gas was included.
7. Page 4, Extent of Contamination: Typo of “confirmation” sampling twice in the first paragraph of this section. In the second paragraph, it is not necessary to call out the high hit of PAH specifically since it is not done for any other contaminant. What is very important is to describe the follow on 2001 sampling that tried to delineate the extent of the PAH contamination between the fence line and the Oakland Inner Harbor and found all PAH hits below 1.0 mg/kg BaP eq. with an average concentration lower than the 0.62 mg/kg BaP eq. screening level. The paragraph as currently written immediately raises the concern of why the Navy is not taking action when PAH levels are so high.
8. Page 5, Risk Assessment: Under this section, it would help support the case for no further action if further explanations under the listing of COPCs were included. For instance, stating that in soil at 0 - 2 ft bgs, all metals were below background, all PCBs and pesticides were below PRGs and all PAHs were below the average screening value. For groundwater, the metals were all below or at background levels.
9. Page 5, Boxed Text: Paragraphs 3, 4 and 5 do not follow. The BCT did not review the RI report and then decide to do a removal action as the text currently states. Rather, based on Phase 1 - 3 sampling, a removal action was performed, then there was follow on data gap sampling and wetland delineation with the subsequent decision not to perform a further removal action, and then the RI report was submitted and a decision made not to take Site 15 into the FS based on low risk.
10. Page 6, first paragraph, second column, last sentence: Table 3 does not show the risk level from metals that are considered to be background. Should it be Table 4?
11. Page 7, Table 3 and Table 4: These tables do not make sense and need to be reworked and better explained. Is there a component, i.e. risk from deeper soil, missing from Table 4? If you add up carcinogenic site risk for soil in Table 4, you get a total of  $6.7 \times 10^{-5}$ , not  $8 \times 10^{-5}$ . If there is an additional amount of risk, i.e.  $1.3 \times 10^{-5}$  attributed to deeper soil, then that must be called out for the table to make sense. Ditto for background carcinogenic risk and for the non-cancer columns. Under the groundwater background carcinogenic risk, risk from arsenic due to background is  $2.2 \times 10^{-4}$  (please refer to the OU 1, 2A and 2B RI reports if you'd like to verify the number).  $8.2 \times 10^{-4}$  is way too high for background. In addition, the background groundwater noncancer HI column does not add up to 21, but rather to 19 if you're rounding to whole numbers. Also, what risk is Table 4 presenting? Is it residential risk for surface soil and groundwater? The table headers need to contain more information. Additionally, Table 3 residential incremental risk should be  $3.2 \times 10^{-5}$  if risk from inorganic chemicals is subtracted. Where did the remaining  $2.8 \times 10^{-5}$  to give  $6.0 \times 10^{-5}$  come from? Table 3 and 4 do not

support each other.

12. Page 8: Under the Ecological Risks section, it would be helpful to mention that the ERA was performed in conjunction with EPA, DTSC, RWQCB and USFW ecological experts to conclude that Site 15 poses little or no risk to ecological receptors.
13. Page 8: Please redo or remove the Regulatory Framework Section since Alameda Point is on the NPL and EPA provides lead regulatory oversight. Also, please revise the last paragraph in the boxed text on page 5, remove RAP from the Table 1 glossary, and remove the Draft Remedial Action Plan reference in the first paragraph and title on page 1.

Comments from EPA's Office of Regional Counsel and from our Community Involvement representative are attached to these comments. Thank you for the opportunity to review this Proposed Plan. We look forward to seeing the revisions incorporated into the Plan before it is released to the public in November. If you have any questions, please call me (415) 972-3029.

Sincerely,



Anna-Marie Cook  
Remedial Project Manager

cc list: Glenna Clark, SWDiv  
David Cooper, EPA  
Suzette Leith, EPA  
Marcia Liao, DTSC  
Judy Huang, RWQCB

attachments

### **Office of Regional Counsel Comments (Suzette Leith):**

1. I'm not sure that the PP should be saying that the BCT concurs with the NFA decision, when we haven't seen the ROD yet.
2. I don't like their definition of the risk range (p.7 note 2). I'd prefer something like "sites having cancer risks which fall into this range may, or may not, require remediation, based upon the nature and extent of contamination, potential exposure, and other site-specific factors." Or something about point of departure. (NCP: "EPA's preference, all things being equal, is to select remedies that are at the more protective end of the risk range. Therefore, when developing its PRGs, EPA uses 10(-6) as a point of departure." (55 FR p.8716))
3. Since this is an NPL site, it is not appropriate to do a RAP/ROD. It is only necessary to comply with CERCLA. The document should be in the form of a ROD, not a RAP/ROD.

### **Community Involvement Comments (David Cooper):**

I have a number of comments, most of them minor edits. I'd like to send them forward to Tracy and Thomas before I leave for active duty.

1. I think the blue banner should identify the facility – Alameda NAS – and should not use the jargon CERCLA or “Installation Restoration,” but just go with “Site 15 Storage Area.”
2. I think the opening paragraph should be re-written to not include jargon. CERCLA is jargon and must be looked up in the glossary on another page. That’s not the way to draw the reader into the document. I suggest something like:  
  
“The US Navy invites you to comment on its recommendation for no further cleanup action for Site 15, a former storage area, at the former Alameda Naval Air Station, in Alameda, CA. The public comment period runs from \_\_\_\_\_ to \_\_\_\_\_.” (You could use Alameda Point, but that’s not the way the site is listed on the NPL.) I would then do a paragraph break, creating a separate paragraph with the remainder.
3. I would move the existing second paragraph elsewhere. While true, it breaks up the logic of the section, which moves from the proposed action (para 1) to the reasons for the proposed action (para 3). A good place might be the beginning of the Environmental Investigations section on current Page 4.
4. The key point for this NFA is that there is not enough contamination left at the site to warrant further cleanup work, so I think that this point should be made as a lead-in to Tracy’s third paragraph – something like:

“Soil samples from Site 15 show that, after an earlier removal of soil with higher levels of contamination, the remaining soil did not pose a human or ecological risk that would require further cleanup actions. Therefore...” (Follow with the rest of her paragraph.)

5. The first bolded item should have an asterisk and then the typical statement at the bottom that items in bold are in the glossary.
6. As with many fact sheets from federal facilities, they tend to follow old templates that put all the supporting/background material up front, forcing the reader to hold a lot of information in their head before getting to the important parts – the explanation of the proposed action and the justification (based on the data). In addition to moving the glossary to the back, which is the usual place for it, I would suggest moving the overall history of Alameda NAS towards the back.
7. BRAC is out of alphabetical order in the glossary. I would add BCT.
8. I would change the title of “History of Site 15” to “Site Description” or simply integrate the information into the following RI section, which is the basis of the proposed no further action.
9. Should “mole” be capitalized? It’s a strange name and should be explained.
10. The term “biocides” is unfamiliar to most people. Is it about the same as “pesticides or herbicides?”
11. On the top of the current Page 4, you could save some space by dropping the “...serves...investigations to:” and just writing it as: “The RI characterized site conditions...” changing key words to past tense.
12. For readability’s sake, I’d watch the length of paragraphs, like in the “Investigations” section. The order of the first paragraph could be changed to be more straightforward. Specifically, the last sentence is important and would work well as part of the first sentence:  
  
“Environmental investigations for soil, groundwater and soil gas, and interim cleanup actions have been underway at Alameda Point (I’d still go with the former Alameda NAS) since the mid-1980s.”
13. To some extent, the listing of all the investigations is not important to the understanding of why the remaining contamination is below levels that would not require further actions. It could be summarized. Also, the reference to the removal action is kind of lost in the middle. It works best where Tracy put it in the next paragraph.
14. In “Extent of Contamination,” there seems to be repetition between the second sentence and the last sentence regarding the sampling results.

15. I think the last part of paragraph three talking about risk and the no further action decision doesn't fit here.
16. There's nothing wrong with it, but the first sentence on current Page 5 uses the word "risk" a lot. I would suggest substituting "the potential for harm..." for the third occurrence of the word.
17. In the boxed area on BCT concurrence, I would spell out BCT, and maybe bold it, if this is the first occurrence. I would also move it to just behind the section that explains the cleanup decision. In other words, I would put the fact that the BCT concurs after the fact sheet justifies the Navy's preferred remedy.
18. On Page 6, Component 4, first paragraph, last sentence, I think you should add ", which means that the cleanup levels will be more protective."
19. The Component 4 section is the hardest one to write, because there's so much information to put out. I think it would be helpful to get the  $10^{-6}$  to  $10^{-4}$  general material first, and then the specifics, and add a reference to total risk and incremental risk. After the second paragraph I'd suggest a separate paragraph like this:

"The federal government has set a protective risk range of between 1 additional cancer case in a population of 1,000,000 (written as  $10^{-6}$ ) and 1 additional cancer case in a population of 10,000 (written as  $10^{-4}$ ). This health-protective risk range was used to evaluate the scenarios listed above for total risk, which includes background risk (from naturally-occurring compounds) and incremental risk (from Navy industrial activities)."

Then I'd continue on with Tracy's "Total carcinogenic..." and delete those items I've moved into the above paragraph.
20. For Table 3, I think the title should be "Site 15 Risk Calculations." I think the scenarios should be titled "Total Residential Risk," because that's how we talk about them in the text, and the other titles should change as well.
21. I think there should be a separate and final section called "Explanation of Preferred Remedy." This could lead with the boxed information on Page 6, or not. It could replace the "Site 15 Status" box on Page 8 (or see my further comments below on the status box). What should be in there is a summation:

"Based on the low levels of incremental contamination and the planned future use for recreation or light industrial, human and ecological health risks are low and fall within the risk management range. The Navy, together with .... no additional remedial action [or you could say "cleanup"] is necessary..."
22. The title "Site 15 Status" suggests some kind of pending action, but since there's no further action, I don't know what it would be. You already have a "Next Steps" section. I don't think it's necessary to repeat the same message if it's covered in other parts.

However, if this remedy includes any additional steps, the installation of Institutional Controls or continuing groundwater monitoring, then this would be a good title and a good place for the information, but then I wouldn't do it as a box. (Often times people skip boxes because they think they're optional information.)

23. The comment period should not run over the holidays. This is important. The public meeting should not be held five days before Christmas. We never hold community activities in this time frame. Many communities have asked that we do not conduct public participation activities from Thanksgiving through the New Year. People tend to be extremely busy with family matters.