



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

N00236.001986
ALAMEDA POINT
SSIC NO. 5090.3

August 1, 2002

Glenna Clark
BRAC Operations, Code 06CA.GC/0718
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

RE: Draft CERCLA Sites 9 and 16 Dissolved-Phase Groundwater Contaminants Non-Time Critical Removal Action, Action Memorandum, Alameda Point

Dear Ms. Clark:

EPA has reviewed the above referenced document, submitted by the Navy on June 17, 2002, and offers the enclosed comments for your consideration. Please call me at (415) 972-3029 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Anna-Marie Cook".

Anna-Marie Cook
Remedial Project Manager

enclosure

cc: Michael McClelland, SWDiv
Andrew Dick, SWDiv
Marcia Liao, DTSC
Judy Huang, RWQCB
Suzette Leith, EPA ORC
Elizabeth Johnson, City of Alameda
Michael John Torrey, RAB Co-Chair
Lea Loizos, Arc Ecology

EPA Comments on Draft CERCLA Sites 9 and 16 Dissolved-Phase Groundwater Contaminants Non-Time Critical Removal Action, Action Memorandum, Alameda Point

General Comment:

An Action Memorandum as described in EPA OSWER Guidance 9360.0-32 dated August 1993, “provides a concise, written record of the decision to select an appropriate removal action....As the primary decision document, it substantiates the need for a removal action, identifies the proposed action, and explains the rationale for the removal action selection.” The Action Memorandum for Sites 9 and 16 would be more concise if it deleted the information that is not relevant to this removal action, such as detailed descriptions of meteorologic, ecologic, geologic and hydrogeologic information for the entire base. In addition, the numerous figures of plume contours included in the Action Memorandum would be more appropriately included only in the EE/CA.

Specific Comments:

1. Section 2.1.4, page 11: Please explain the statement “Concentrations of VOC in soil samples collected from CERCLA Sites 9 and 16 during the OU 1 and 2 RI investigations were all below U.S. EPA Region 9 PRGs for migration to groundwater at a dilution-attenuation factor (DAF) of 20. As a result, VOCs in soil are not considered to be sources of groundwater contamination at CERCLA Sites 9 and 16...” Usually VLEACH or some similar model is used to determine concentrations from soil to groundwater. What is the basis for using a DAF, and how was 20 decided? If the soils at Site 9 and 16 are not the source of groundwater contamination, where is the source?
2. Page 13, first paragraph: Data collected from June through August of 2001 should be available for inclusion in this removal action. This paragraph should be updated.
3. Table 2-4 and Section 2.2.1: EPA believes that a soil removal action was conducted at Site 16 in 1995-1996. Please check the administrative record to verify this action and include a summary of the removal action in this section and table.
4. Page 26, second paragraph: Please explain the statement “In some instances, rebound effects occur following oxidizer addition, in which COC concentrations first decrease, then increase, to higher levels than initially present.” What would cause the concentrations to increase above original levels?
5. Page 26, last paragraph: Please factor in that use of permanganate at Site 25, albeit in soils only, was very unsuccessful. The high organic carbon content in the soils at

Alameda may be a factor in the failure of permanganate to work on contaminants, even in groundwater.

Comments for EPA's Office of Regional Counsel:

1. Page 31-32. Document incorrectly indicates that for a State requirement to be ARAR, it must be "a State law." A State regulation or other requirement can also be ARAR if is a "promulgated standard, requirement, criteria or limitation under a State environmental or facility siting law."
 2. p.38– Document indicates that contaminated groundwater will be treated and discharged to a POTW. Since this is considered to be off-site activity, requirements for discharge to a POTW are not considered to be ARARs. However, both procedural and substantive requirements for disposal to a POTW must be complied with. EPA requirements are at 40 CFR 403.5. These are generally prohibitions on what can be discharged. The Navy will also need to comply with local POTW requirements, which may be in addition to the EPA requirements. EPA recommends that the document indicate that these requirements will be complied with.
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3. Table 5-2, box for compliance with ARARs. It is not clear how the statement that "hexavalent chromium levels above MCLs could impact groundwater" fits into the compliance with ARARs box. We recommend that this be explained.