

Alameda Reuse and Redevelopment Authority

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Governing Body

Beverly Johnson
Mayor, City of Alameda
City of Alameda

June 16, 2005

Marie Gilmore
Councilmember/Community
Improvement Commissioner
City of Alameda

Mr. Thomas L. Macchiarella
BRAC Environmental Coordinator
Navy BRAC Program Management Office
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8571

Tony Daysog
Councilmember/Community
Improvement Commissioner
City of Alameda

Frank Matarrese
Councilmember/Community
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Re: Draft Final *OU-2B Remedial Investigation Report, Sites 3, 4, 11, and 21, Alameda Point, Alameda, California*

Dear Mr. ~~Macchiarella~~ *Thomas*:

Doug deHaan
Councilmember/Community
Improvement Commissioner
City of Alameda

The Alameda Reuse and Redevelopment Authority (ARRA) is pleased to have the opportunity to comment on the Navy's May 16, 2005 Draft Final *OU-2B Remedial Investigation Report, Sites 3, 4, 11, and 21, Alameda Point, Alameda, California* (draft final *RI*), and requests that this letter be included in the administrative record. Our comments address only certain aspects of the *RI*'s Appendix F, "Draft Final Human Health Risk Assessment" (HHRA). Specifically, these comments pertain to health risks to current workers in buildings at OU-2B. ARRA is not submitting comments at this time for the rest of the draft final *RI*.

William C. Norton
Acting City Manager/
Executive Director

1. In the final *RI*, please include estimates of health risks to current workers separately for all buildings at OU-2B that are currently being used. The draft *RI*, estimates health risks to current workers separately for currently occupied buildings at OU-2B (Section 7.5.3.1 on page F-58 of Appendix F of the April 1, 2004 *RI*). Inexplicably, the draft final *RI* no longer estimates these building-specific risks. Instead, the health risk to current workers is calculated OU-wide, as though workers in all buildings are similarly exposed. This assumption appears to be inappropriate, because groundwater contamination by volatile organic compounds (VOCs) in the vicinity of some buildings is much greater than near others.
2. The text of the HHRA apparently understates the health risks to current workers at OU-2B. The "Current/Future Commercial/Industrial Worker" subsection of Section 7.4.2 on page F-39 states:

"[V]apor intrusion to indoor air was the only complete groundwater pathway for the commercial/industrial worker. The total carcinogenic risk from exposure to

groundwater via vapor intrusion is 1×10^{-4} , which is within the risk management range of 1×10^{-4} to 1×10^{-6} for carcinogens (see Table F-9.1.1). The majority of this risk is associated with exposure to TCE (1×10^{-4}), which is the only analyte exceeding the 1×10^{-6} risk level.”

However, the referenced Table F-9.1.1 estimates much higher health risks to current workers. The above-cited passage from Section 7.4.2 should be restated as follows in order to agree with Table F-9.1.1 (changed portions are **emphasized**).

“Vapor intrusion to indoor air was the only complete groundwater pathway for the commercial/industrial worker. The total carcinogenic risk from exposure to groundwater via vapor intrusion is **1.5×10^{-3}** , which is **15 times higher than** the risk management range of 1×10^{-4} to 1×10^{-6} for carcinogens (see Table F-9.1.1). The majority of this risk is associated with exposure to TCE (**1.5×10^{-3}**), which is the only analyte exceeding the 1×10^{-6} risk level.”

The risk information in Table F-9.1.1, which applies specifically to IR-03, is repeated in Tables F-9.2.1, F-9.3.1, and F-9.4.1, which pertain to IR-04, IR-11, and IR-21, respectively.

The apparent understatement of human health risks is carried forward to the body of the draft final *RI*, including the “Executive Summary” and Section 10.5 “OU-wide Groundwater Plume Conclusions and Recommendations”. This discrepancy should be resolved in the final *RI*.

3. The final *RI* should recommend that an Indoor Air Sampling Assessment of all currently used buildings in OU-2B be conducted as promptly as practical. This recommendation is appropriate, even if the estimate of health risk to current workers is 1×10^{-4} , rather than 1.5×10^{-3} (see our comment 2). Current guidance¹ suggests that Additional Site Characterization, such as soil gas sampling, may be an appropriate next step, followed by an Indoor Air Sampling Assessment if indicated by the Additional Site Characterization. However, at OU-2B several factors argue for an Indoor Air Sampling Assessment next:
 - a. Indoor air exposures of current workers are ongoing.
 - b. The Preliminary Screening Evaluation in the draft final *RI* estimates the health risks to current workers to be more than an order of magnitude above the risk management range.
 - c. Groundwater characterization, which is used in the draft final *RI* to estimate indoor air VOC exposures, is poor at many buildings in OU-2B.

¹ Department of Toxic Substances Control (DTSC), *Interim Final, Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*. December 15, 2004 (revised February 7, 2005)

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- d. If the DTSC guidance is followed literally, an unacceptable delay would occur before an Indoor Air Sampling Assessment is completed. The delay would be due to (1) Navy's need to identify funding for Additional Site Characterization; (2) obtaining a Navy contractor to do the sampling; (3) field preparation, mobilization, and sampling; (4) sample analysis; and (5) evaluation and reporting of sampling and analysis results.

Given that it is at least somewhat likely that an Indoor Air Sampling Assessment will ultimately be needed, the pros and cons of conducting an Indoor Air Sampling Assessment next favor doing the Indoor Air Sampling Assessment as promptly as practical. On the con side:

1. a thorough Additional Site Characterization might conclude health risks to current workers are much lower than are estimated in the draft final *RI*, eliminating the need for an Indoor Air Sampling Assessment.

On the pro side:

1. if current workers are truly at risk, the need for protective action will be conclusively demonstrated sooner; and
2. an Indoor Air Sampling Assessment showing acceptable health risks to current workers would save the time and expense of an Additional Site Characterization.

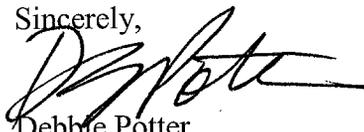
Navy's May 2005 flyer *Navy Environmental Sampling and Site Update for Operable Unit 2B, Alameda Point, Alameda, California*, states:

"As part of our ongoing environmental program at Alameda Point, the Department of the Navy is informing tenants in Operable Unit 2B that we intend to conduct additional sampling of soil vapors or indoor air at Buildings 14, 113, 162, 163, and 398. The Navy plans to conduct this work in summer of 2005."

ARRA requests that indoor air sampling be conducted, with or without soil vapor sampling.

Thank you for your attention to our comments. If you have any questions or need additional information, please call me or Peter Russell at (415) 492.0540.

Sincerely,



Debbie Potter

Base Reuse & Redevelopment Manager

DP:IF:sb

cc: Anna-Marie Cook, USEPA
Judy Huang, RWQCB
Marcia Liao, DTSC
Peter Russell, Russell Resources