



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
SFD 8-3

N00236.002104
ALAMEDA POINT
SSIC NO. 5090.3

August 4, 2005

Thomas Macchiarella
NAVY BRAC PMO, Code 06CA.TM
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8571

**RE: Draft Proposed Plan for Groundwater, Western Hangar Zone, Installation
Restoration Site 26, Alameda Point**

Dear Mr. Macchiarella:

Please find enclosed EPA's comments from our review of the Draft Proposed Plan for Site 26, submitted by the Navy on June 20, 2005. To accommodate an extension request from DTSC, and to respond to queries from EPA regarding risk and RAO language in the Proposed Plan, the Navy agreed to extend the comment period for the regulatory agencies by two weeks to August 4, 2005.

We look forward to working together to resolve the concerns raised in our comments. Please call me at (415) 972-3029.

Sincerely,

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

Anna-Marie Cook
Remedial Project Manager

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

**EPA Comments on the Draft Proposed Plan for Groundwater, Western Hangar Zone,
Installation Restoration Site 26, Alameda Point**

1. Page 1, statement that soil does not require any further action. This implies that some action was previously taken for soil at this site. EPA recommends a short clarification summarizing investigations of the soil at this site and the reason why no action is required.
2. Page 4, Step 2, and Page 5, Cancer Risk: We disagree with the way in which risk is presented in this PP. 1) The risk presented on page 5 is that resulting from using soil gas concentrations in the risk calculations. Groundwater at this site is found at depths of as little as two feet below ground surface which makes the results of the soil gas analysis questionable. In addition, the risk values using soil gas data are an order of magnitude lower than those calculated using an EPC concentration for groundwater. It does not seem appropriate to chose the lowest and least supportable value of risk for the PP. 2) In the FS, it states that in a scenario where all VOCs break down to vinyl chloride, the groundwater EPC would be 14 times higher than the current residential scenario, and the risk would be 14 times higher, i.e. $(3 \times 10^{-6}) \times 14 = 4.2 \times 10^{-5}$. This value, although it does not address the worst case scenario presented by the risk from a hot spot in the plume where all VOCs have degraded to vinyl chloride, is more in line with the risk number that EPA would expect, and supports our assertion that active remediation is necessary even without calculating the worst case scenario. Please revise the risks presented on these pages to present a more conservative scenario.
3. Page 3 or page 4: There is no discussion of the expected reuse of the site.
4. The RAOs are discussed in the PP on page 5 and page 6; however, there is no mention of what the RAOs are.
5. On page 5 there is no discussion that TCE and DCE may degrade further to vinyl chloride which would increase the risk and be further reason to chose an active remediation alternative.
6. Page 5, last sentence: "The ...BCT has concurred with the report setting cleanup levels above MCLs for the central region..." This leaves the impression that a conclusive determination has been reached that cleanup levels will always be set above MCLs for every site in this region. A more accurate statement would be that the BCT preliminarily concurred that setting cleanup levels at MCLs may not be necessary depending on site-specific analysis and whether certain conditions were met. We recommend simply deleting that last sentence.
7. Description of the preferred alternative 6 (pages 6, 9 and 10). In our comments of March 31, 2005 on the Draft Final FS, EPA noted that any remedy that does not result in groundwater concentrations being remediated to MCLs needs to include institutional

controls to protect against consumption of the groundwater. We also noted that it may be necessary for the ICs to prohibit residential use of the property, although at Site 26 it may be possible to fashion a remedy under which residential use of the property can be allowed after the groundwater is remediated to PRGs that adequately address both the inhalation and the accidental ingestion pathway. The description of the preferred alternative does say that there will be ICs to restrict residential reuse which is also EPA's preference. However, it specifically states that there will only be three years of ICs. Similarly, in the box on page 10, one of the rationales for the Navy's preferred remedy is that it limits the term of required ICs to three years. Given that we don't know what the RAOs are, it is difficult to estimate how long it will take to reach MCLs after the RAOs are reached, and whether three years is a reasonable estimate. We are generally concerned that the Navy does not acknowledge here that further ICs may be necessary to prohibit consumption, even if the risk-based RAOs are reached. We therefore request that the Proposed Plan state "EPA is concerned that even if MCLs are not selected as ARARs and are not used as the targets for groundwater cleanup, measures need to be in place to protect against consumption of the groundwater in the event that contamination remains in excess of drinking water standards. Therefore, the remedy may include a contingency of continued ICs prohibiting consumption of the groundwater unless and until concentrations are reduced to MCL levels."

8. Page 5, line six, should delete "for unrestricted use sites" in the discussion of the risk range.
9. Page 5, Table 2, in the health risks column, remove "generally allowable" and replace it with "risk management range." Additionally, in the paragraph under the table, delete the first sentence.
10. Page 6, line 7 needs to be rewritten. It says that background cancer risk is one in a million, whereas on page 5 individual lifetime background risk is one in five. Rewrite as "These groundwater remediation goals reflect a protective risk level of the probability of a one in one million, or 10^{-6} , increased risk of cancer above the individual lifetime background risk of one in five."
11. Page 6, Remedial Alternative 2: As stated in our letter of March 31, 2005, we remain concerned with the Navy's inclusion of "groundwater confirmation sampling" (i.e. monitoring) as a stand-alone remedial action alternative. Since monitoring by itself does not prevent or minimize a release, it does not meet the CERCLA definition of remedial action, although CERCLA clearly includes monitoring as a component of a remedial action.
12. Page 7 under "not applicable," in the first sentence, EPA requests that the sentence be changed to say that "... MCLs for organic compounds have been determined by the Navy not to be federal chemical specific ARARs."

13. Page 9, box about ICs. The ICs need to include no residential use of the property until RAOs are met (assuming the selected RAOs are protective of the inhalation threat and similar to MCLs). The ICs should also include no consumption of the groundwater until MCLs are achieved. For clarity the third bullet should specify "Protect monitoring wells installed as part of the remedy and other equipment installed at IR Site 26."

Comments from EPA's Office of Community Involvement:

There are a number of issues with this proposed plan which are identical to those I identified for the Site 25 Proposed Plan. Rather than reiterate them, I would suggest a review of the first page of my Site 25 comments.

General Comments

1. It would be best if the proposed plan 10 pages or less.
2. It would be more readable if many of the paragraphs were shorter and the point size larger.
3. During the RI discussion, stay focused on two things: what did the RI find *that needs to be cleaned up* and how will the alternatives address those contaminants that need to be cleaned up?
4. Tie the Risk Assessment section to the different ways the alternatives address risk scenarios, so readers will be able to express a preference.
5. When I talk about redundancy, I'm not usually talking within a paragraph, but between sections.
6. I would describe the various possible remedy elements (ISCO, ISB, etc.) before I introduce them in various combinations in the Alternatives section.

Specific Comments

1. Suggest simplifying the Heading: "Western Hanger Zone, Groundwater Proposed Plan, Installation Restoration Site 26." You do not need the word "draft."
2. Suggest a more direct Headline: "Navy Requests Public Comments on Cleanup Plan." The headline should not be chiefly about the RI; that information should have already been covered in other fact sheets.
3. Page 1. There is too much information on this page and the order of presentation is not optimal. Some important information gets lost (for instance, the fact that soil does not

require further action); other information is unnecessary (the defense of the remedy selection in the second column). Suggest re-writing this to put the important information first.

4. Page 1. The items in bold need to be identified as being listed in the glossary. First usage should have an asterisk. Bottom should have a footnote.
5. Page 1. The second sentence in column one, paragraph one is redundant.
6. Page 1. The third sentence in column one, paragraph one is misleading. Contamination exists; it is not "suspected." I would delete this sentence.
7. Page 1. The last sentence in column one, paragraph one is incomplete. "The Proposed Plan briefly summarizes site investigations, describes *all cleanup alternatives*, and identifies the Navy's preferred alternative.
8. Page 1. Suggest moving the second paragraph to the section on Site Investigations.
9. Page 1. The second column second sentence is very long and includes some information that is better suited for the more complete alternative description later in the document (i.e., the explanation of what the ICs will accomplish). The reference to the interim action is better suited to a different section, perhaps "Completed Removal Actions" or "Other Removal Actions."
10. Page 1. The "Key Items" is a good idea, but to save space, I would only list the most important ones. This reads more like a table of contents, which is not necessary. Another possibility would be to move it to the second page – most Tables of Contents appear on the second page of periodicals (or later).
11. Page 1. Suggest saving space in the 30-day Comment Period box by deleting the redundant reference to the public meeting, which is covered in the next section. Further space could be saved by displaying only the comment period dates and directing them to Page 10.
12. Page 1. Suggest saving space in the Public Meeting section by deleting such elements as the site reference and the meeting details. Again, directing them to Page 10 saves space.
13. Page 1. There should also be language to encourage people to comment on all cleanup options and the RI/FS.
14. Page 2. The first sentence is not necessary. The second sentence is redundant with the information in the first paragraph, Page 1.
15. Page 2. The second and third paragraphs contain important information which should

- appear on the first page, near the beginning of the document, and could allow the deletion of all the text in the Page 1 box highlighting the Comment Period and Public Meeting – this could allow the highlight box to simply state the Comment Period and the Meeting, with their dates, which is a common EPA approach. Neither is right or wrong, but this illustrates again how much redundancy is built into the draft fact sheet and how much space could potentially be saved.
16. Page 2. Site Background. Suggest moving the bulk of the site background towards the back of the fact sheet as background.
 17. Page 2. There is better language for the ROD which includes the statement that no decision will be made until all comments are received and considered. The final remedy may change based on comments received.
 18. Page 2. Site Background. The first sentence is not correct. Alameda Point did not cease operations – Alameda NAS did. Alameda Point is the new name.
 19. Page 2. Site Background. Much of the information in the first, long paragraph seems to be not about the background or history, but mostly a delineation of the site boundaries and where they overlap (soil vs groundwater). Suggest renaming the section to reflect its contents. There is some redundancy in the paragraph.
 20. Page 2. Site Background. There is a formatting error. The paragraph needs a space break.
 21. Page 3. Site Background, 1st column. Some material is not site background. Suggest placing in Site Investigation.
 22. Page 3, 1st column, 2d paragraph. “Currently visible in the pavement” is unnecessary.
 23. Page 3, Site Investigations. There are redundancies with the previous sections. Suggest consolidation; could be shortened and summarized.
 24. The Risk Assessment section is too long and includes information that does not assist the public in commenting on the alternatives.
 25. Page 5. Eco Risk Assessment. The second sentence makes no sense. “Neither” requires two items of comparison.
 26. Page 5. Remedial Action Objectives. The concepts of RAO and PRG were not well-introduced.
 27. Page 5. I don’t understand the last paragraph, last two sentences.
 28. Page 5-6. The text never said what the RAOs were.

29. Page 6. Summary of Alternatives. This does not need an opening paragraph (saves space).
30. Page 6. RA1. Start with the second sentence – define, then explain.
31. Page 6. RA3. Only 70 years. Suggest “costed out for 70 years.”
32. Page 6. RA4. Not clearly written; order of presentation awkward; no basis for the number of years. The price is the same as RA3, but it has extra elements. Why is the cost the same?
33. Page 6. RA5. ISCO not defined.
34. Page 6. RA6. Don’t highlight the preferred alternative at this point. Let the reader absorb and understand all the alternatives first. ISCO and ISB not defined.
35. Page 6. RA7. “Limited” ISCO? Needs better definition. The “41.5 years” seems like a false precision.
36. Page 6. RA8. I was unsure about this explanation.
37. Page 6. Table 4. I would reformat so that the alternatives are easier to read.
38. Page 7. I would delete the ARARs section. It is not necessary and takes up space.
39. Page 9. Table 7. Alternative 1 is not protective and fails the threshold criteria. It should not be evaluated in this table, but its failure to meet the threshold can be noted. The Table is not easy to read because it is scrunched up. Eliminating unnecessary text from the rest of the fact sheet would allow this table to be sized for readability. I liked the use of additional text and the use of color, but I wasn’t sure about the logic of some of the ratings.
40. Page 10. The Preferred Alternative is discussed in two separate places on the same page, so there is some duplication. Suggest just doing one expanded discussion.

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