



## Department of Toxic Substances Control



Alan C. Lloyd, Ph.D.  
Agency Secretary  
Cal/EPA

700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721

Arnold Schwarzenegger  
Governor

August 20, 2005

Mr. Thomas L. Macchiarella  
Southwest Division Naval Facilities Engineering Command  
Attn: Code 06CA.TM  
1220 Pacific Highway  
San Diego, CA 92132-5190

### **DRAFT PROPOSED PLAN, IR SITE 15, ALAMEDA POINT, ALAMEDA, CALIFORNIA**

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Proposed Plan for Site 15 dated June 27, 2005. We concur with EPA (see EPA comment letter dated July 27, 2005) that the risk tables are confusing and that discussions on substantive data, i.e. detected levels of contaminants, should be strengthened. Attached are the comments from DTSC Public Participation Unit. The electronic version of these comments was previously transmitted on July 29, 2005. If you have any questions, please do not hesitate to contact me at 510-540-3767 or [mliao@dtsc.ca.gov](mailto:mliao@dtsc.ca.gov).

Sincerely,

Marcia Liao  
Remedial Project Manager  
Office of Military Facilities

Enclosure

cc: Greg Lorton, SWDiv  
Glenna Clark, SWDiv  
Anna-Marie Cook, EPA  
Judy Huang, RWQCB  
Charlie Huang, DFG  
Elizabeth Johnson, City of Alameda  
Peter Russell, Russell Resources  
Jean Sweeney, RAB Co-Chair  
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**TO:** Marcia Liao, Project Manager  
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**Via:** Diane Fowler  
Supervisor, Public Participation Unit

**FROM:** Richard A. Perry, Public Participant Specialist 

**DATE:** July 29, 2005

**SUBJECT:** Proposed Plan for Comprehensive Environmental Response,  
Compensation, Liability Act; Site 15, a Former Transformer Storage Area

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### General Comments:

This Proposed Plan incorporates many of the past suggestions made on prior plan reviews. This is an example of an easy to read and understandable document that provides the interested and affected community with an ample history and past activities associated with the Site and Project as a whole.

There are still some comments that I have made on Site 15's Plan, but far fewer than on past documents I have reviewed.

### Specific Comments:

Page 1

1) The title of this plan is so long and convoluted it is a bit difficult to understand. However, the sub title explains well what the Plan is addressing and I would urge you to make a change that shortens the title. Perhaps, Proposed Plan for No Further Action at IR Site 15, a Former Transformer Storage Site.

2) Strike the long reference to CERCLA in the Title.

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3) The description of the Site location is fine; however, the size and scale of Figure 1 could be reduced showing less of Alameda Point and closer view of the site and its location. This would give more space and shorten the total size of the Proposed Plan.

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4) Table 1. The Risk Ranges Table is too busy and difficult to understand. Suggest removing or simplifying this table. The data is expressed elsewhere in the document and this one page increases the difficulty of understanding a Proposed Plan that has been drafted in a much easier to read and understand format.

cc:

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