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November 8, 2005

Ms. Anna-Marie Cook
Project Manager
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street, (SFD-8-2)
San Francisco, CA 94105-3901

Dear Ms. Cook:

Subj: RESPONSES TO COMMENTS ON THE DRAFT FINAL PROPOSED PLAN FOR IR
SITE 26, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Enclosure (1) is submitted for your information and records.

Please call Ms. Glenna Clark, at (619) 532-0951, if you have any questions.

Sincerely,

THOMAS L. MACCHIARELLA
BRAC Environmental Coordinator
By direction of the Director

Encl: (1) Responses to Comments on the Draft Final Proposed Plan, Installation Restoration
Site 26, Alameda Point, Alameda, California

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RESPONSES TO REGULATORY AGENCY COMMENTS ON THE DRAFT FINAL PROPOSED PLAN, WESTERN HANGAR ZONE, INSTALLATION RESTORATION SITE 26, ALAMEDA POINT, CALIFORNIA

This document presents the U.S. Department of the Navy's (Navy) responses to comments from the U.S. Environmental Protection Agency (EPA) Region IX and the California Department of Toxic Substances Control (DTSC), on the "Draft Final Proposed Plan for the Western Hangar Zone, Installation Restoration Site 26, Alameda Point, Alameda, California," dated September 2005. The Navy received the comments from EPA on October 5, 2005 and from DTSC on October 3, 2005.

RESPONSES TO EPA COMMENTS

Comment 1: Page 1, first column, first para & page 4, second column, third para: delete the word "further" from no further action for soil. There has never been any action so it needs to be written simply as "no action". RTC said this had been done, but it hasn't.

Response: Further was removed from the final proposed plan.

Comment 2: Page 4, Risk Table: Thanks for putting in the text that the worst case is being used in the risk assessment: that part is great. However, the FS number is wrong and the value really is 4.5×10^{-5} . Please calculate $14 \times (3 \times 10^{-6})$ yourself (see page 2-25, top of the page in the draft final FS) if you need to double check me.

Response: Potential cancer risk from volatile organic compounds (VOCs) in groundwater degrading to vinyl chloride, based on the EPA-derived toxicity value, was revised to 4×10^{-5} . The product of $14 \times (3 \times 10^{-6})$ is equal to 4.2×10^{-5} , which was rounded to one significant digit.

Comment 3: Page 7, Criteria 1 and 2. Although we disagree that gw monitoring as a "remedy", or a 3 year MNA, we are o.k. with you keeping it in the PP so it syncs with the FS. However, gw mon does nothing to protect human health, and it does not meet ARARs. Simple fix: Remove the " 2" from after the word "Alternatives" in criteria 1 and 2 and then we'll be fine.

Response: The proposed plan was revised as requested.

RESPONSES TO DTSC COMMENTS

Comment 1: Solid Waste Management Unit (SWMUs): DTSC has completed the review of Solid Waste Management Units (SWMUs) located within Site 26. The review includes an evaluation of the closure information submitted electronically by the Navy on August 29, 2005, the Environmental Baseline

Survey (EBS) report dated June 2001, and observations made during the site visit on September 21, 2005. Our review findings are attached (Attachment A) and can be summarized below:

- **DTSC concurs with the NFA (no further action) determination on five SWMUs (AST 024A, AST 024B, AST 024C, AST 024D, and AST 024E)**
- **DTSC concurs with further evaluation determination on two SWMUs (OWS 020 and WD 020);**
- **DTSC asks the Navy to contact California Regional Water Quality Control Board (RWQCB) for the closure determination on two SWMUs (AST 021B and AST 540);**
- **DTSC requests further evaluation on five SWMUs (NAS GAP 19, NAS GAP 20, NAS GAP 21, NAS GAP 22 and WD-023);**
- **DTSC has identified floor drains and areas outside of hangar doors as potential Areas of Concerns (AOCs) and recommends further evaluation.**

Response: Resource Conservation and Recovery Act (RCRA) was removed from the following sentence in the remedial action objectives (RAO) section of the proposed plan: “Because the RI indicated low incremental risk for soil, the Navy, together with the BCT, has agreed that no action for soil under CERCLA is required at Site 26.”

Regarding action under RCRA, the Navy will coordinate with Water Board for closure of aboveground storage tanks (AST) 021B and 540, and the Navy disagrees with DTSC’s conclusion that further evaluation is needed for the four generator accumulation points (GAP) (NAS GAP 19, NAS GAP 20, NAS GAP 21, NAS GAP 22), and washdown area (WD) -023, and floor drains.

The Navy disagrees that floor drains are present within the hangar buildings; Doug DeLong accompanied DTSC personnel on a site visit to Site 26 in early October 2005, and no floor drains were observed.

NAS GAP 19 was located northeast of Building 20 inside former Building 536, a maintenance shelter. The RCRA Facility Assessment (RFA) indicated a low potential for releases into soil and groundwater because the unit was situated on concrete pavement. No staining was noted at the time of the RFA or later during the environmental baseline survey (EBS). An RCRA Facility Investigation (RFI) was not recommended in the RFA (DTSC 1992). Based on this information, the Navy does not see a plausible cause for a release to soil or groundwater. Therefore, the Navy hereby requests that DTSC withdraw its request for further evaluation of NAS GAP 19.

NAS GAP 20 was located west of Building 21. The RFA indicated a low potential for releases into soil and groundwater because the unit was situated on concrete pavement. The SWMU was classified as low priority; an RFI was not recommended (DTSC 1992). The area was evaluated during the EBS Phase I investigation (ERM-West 1994). The SWMU was noted but did not require further investigation as a target area. The SWMU area was indirectly investigated as part of the EBS zone-wide Phase 2A soil sampling at Zone 06, Parcel 191 (IT 2001). Based on this information, the Navy does not see a plausible cause for a release to soil or groundwater. Therefore, the Navy hereby requests that DTSC withdraw its request for further evaluation of NAS GAP 20.

NAS GAP 21 was located west of Building 22. The RFA indicated a low potential for releases into soil and groundwater because the unit was inside a self-contained shed situated on concrete pavement. The SWMU was classified as low priority; an RFI was not recommended (DTSC 1992). The area was evaluated during the EBS Phase I investigation (ERM-West 1994) and indirectly investigated as part of EBS Phase 2A zone-wide soil sampling at Zone 06, Parcel 33 (IT 2001). Based on this information, the Navy does not see a plausible cause for a release to soil or groundwater. Therefore, the Navy hereby requests that DTSC withdraw its request for further evaluation of NAS GAP 21.

NAS GAP 22 was located west of Building 23. The RFA indicated a low potential for releases into soil and groundwater because the unit was inside a self-contained shed situated on concrete pavement. The SWMU was classified as low priority; an RFI was not recommended (DTSC 1992). The area was evaluated during the EBS Phase I investigation (ERM-West 1994). The SWMU was noted but did not require further investigation as a target area. The SWMU area was indirectly investigated as part of EBS Phase 2A zone-wide soil sampling at Zone 06, Parcel 190 (IT 2001). Based on this information, the Navy does not see a plausible cause for a release to soil or groundwater. Therefore, the Navy hereby requests that DTSC withdraw its request for further evaluation of NAS GAP 22.

WD-023 is located northeast of Building 23, within CERCLA Site 26 on EBS Parcel 32. This area was historically used as an airplane parking lot for planes waiting to be serviced in one of the buildings. The area was evaluated during the EBS Phase I investigation (ERM-West 1994). ERM-West noted some staining around a catch basin in the washdown area. The area was further investigated as part of the Zone 6, Parcel 32, Phase 2A, EBS sampling (specifically Target Area 1, open space washdown area) (IT 2001). Two shallow groundwater samples and three soil samples were collected within the footprint or just outside the footprint of WD-023. Soil and groundwater samples were collected in the washdown area and analyzed for total petroleum hydrocarbons (TPH), metals, volatile organic compounds (VOC), semivolatile organic compounds (SVOC), and polynuclear aromatic hydrocarbons (PAH). Although analyzed, PAHs and metals were not evaluated in this assessment based on the types of materials stored, used, or generated in the washdown area. All analytes were either not detected or detected

at concentrations below residential preliminary remediation criteria (PRC) (Navy 2001), EPA preliminary remediation goals (PRG) (EPA 2002), or maximum contaminant levels (MCL) (California Department of Health Services 2003). No additional sampling was recommended within Parcel 32 Target Area 1 (IT 2001). Based on this information, the Navy does not see a plausible cause for a release to soil or groundwater. Therefore, the Navy hereby requests that DTSC withdraw its request for further evaluation of WD-023.

Comment 2: Plume Delineation: DTSC appreciates the changes included in this PP concerning additional plume delineation. For clarity, please insert appropriate language to ensure that the plume will be delineated during the remedial design phase both horizontally and vertically to levels consistent with remediation goals.

Response: Delineation of the vertical and lateral extent of the plume was added to the text for the RAOs.

Comment 3: Groundwater Remediation Performance Standard: DTSC appreciates the changes included in this PP concerning groundwater remediation performance standards. For clarity, please insert appropriate language to ensure that the criteria will specify the target concentrations for groundwater and saturated soil upon which the treatment system can be terminated (i.e. shutting down criteria).

Response: No change was made to the proposed plan based on this comment. Groundwater remediation performance standard will be addressed in the record of decision (ROD).

Comment 4: RCRA Corrective Action: This Proposed Plan still makes no mention of RCRA corrective action. Please address it.

Response: The following text was added to the Site Description in the proposed plan: "Site 26 contains multiple solid waste management units (SWMUs), which include seven aboveground storage tanks, one oil-water separator, two washdown areas, and four generator accumulation points."

The following text was added to the remedial investigation (RI) summary in the final proposed plan: "The RCRA SWMU evaluation process is incomplete at this time, but Navy will complete the process prior to issuance of the ROD."

The following text regarding corrective actions was already included in the draft final proposed plan:

"Groundwater contaminated with fuel hydrocarbons is also present at Site 26 and is being addressed under the Alameda Point total petroleum hydrocarbons program. Fuel hydrocarbons are present in groundwater southwest of Building 23

and in an area designated as corrective action area 6, located to the northeast of the site.”

“A storm sewer segment located between Buildings 23 and 24 may have received waste from operations at Site 5, the Navy plans to address impacts to this storm sewer segment as part of Site 5 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activities.”

Comment 5: IR 26 Areas to be cleaned up under different programs: For clarity please consider to enlarge Figure 2 to sufficiently show areas that are not to be cleaned up under the proposed remediation scheme, i.e., the fuel hydrocarbons cleanup southwest of Building 23, storm sewers between Building 23 and 24, and the petroleum Corrective Action Area 6 (CAA-6).

Response: An additional figure showing features was added. If Figure 2 was enlarged, it would no longer show the site location as it is intended.

Comment 6: Sewer near Building 20: Infiltration of contaminated groundwater at sewer near Building 20 was reportedly a concern according to the 2001 sewer study. Please explain why the Navy no longer considers this segment of sewer a concern and why the Navy does not believe storm sewers or bedding material near Building 20 will act as a preferential pathway.

Response: No change was made to the proposed plan based on this comment.

As stated in the RI report for Site 26 (Bechtel 2003), the storm sewer report (Tetra Tech 2001) concluded that the segments of storm sewer lines northeast and southeast of Building 20 are low priority lines that should eventually be repaired to prevent possible infiltration of contaminated groundwater. Subsequent sampling of the storm sewer outfall downstream of Site 26 and along the Oakland Inner Harbor did not indicate that the storm sewer is acting as a preferential pathway. In 2002, an investigation was conducted to determine whether the storm sewer bedding material is acting as a preferential pathway. The data summary report for this investigation (Tetra Tech 2002) concluded that the storm sewer bedding material and the storm sewer lines are not acting as a preferential pathway.