



# California Regional Water Quality Control Board

## San Francisco Bay Region



Alan C. Lloyd, Ph.D.  
Secretary for  
Environmental  
Protection

1515 Clay Street, Suite 1400, Oakland, California 94612  
(510) 622-2300 • Fax (510) 622-2460  
<http://www.waterboards.ca.gov/sanfranciscobay>

Arnold Schwarzenegger  
Governor

Date: **NOV 28 2005**  
File: 2199.9285(JCH)

Mr. Thomas L. Macchiarella  
Department of the Navy  
Base Realignment and Closure Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310

N00236.002175  
ALAMEDA POINT  
SSIC NO. 5090.3

**Subject: Comments on the Draft Proposed Plan for the Seaplane Lagoon (IR Site 17) at Alameda Point, Alameda, California**

Dear Mr. Macchiarella:

The San Francisco Bay Regional Water Quality Control Board (Water Board) staff reviewed the *Draft Proposed Plan for the Seaplane lagoon (IR Site 17) at Alameda Point, Alameda, California*, dated October 14, 2005 (Draft PP) and has the following comments:

- Page 1, Second Paragraph:** This paragraph stated "Seven alternatives (including the No Action Alternative) were developed and evaluated based on extensive field investigations; laboratory analyses; data evaluation and interpretation; review of past, current, and future conditions; and a thorough assessment of potential human health and ecological risks posed by exposure to sediments within the lagoon." Please remove the word "thorough" from the Draft Proposed Plan as there are additional measurement endpoints, e.g. sports fish that could have been evaluated.
- Page 6, Human Health Risk Assessment, First Paragraph:** This paragraph stated "Only the potential human health risks associated with exposure to PCBs in Seaplane Lagoon were higher than those for San Francisco Bay reference stations." Navy has not demonstrated sufficiently to Water Board staff that this statement is true. Please replace it with the following sentence "Only the potential human health risks associated with exposure to PCBs in Seaplane Lagoon exceed an acceptable risk threshold."
- Page 6, Conclusion of the Remedial Investigation, last bullet:** This bullet stated "Risks to human health were primarily associated with exposures to PCBs in sediments and accumulation of PCBs in forage fish that could be ingested by people." Please revise the sentence to state, "Risks to human health were primarily associated with consumption of PCB-contaminated fish caught in Seaplane Lagoon."
- Page 6, Remedial Goals, First Paragraph:** This paragraph stated "The numerical cleanup goals are based on protecting the least tern, which was determined to be the most sensitive ecological receptor evaluated in the ERA." The numerical cleanup

*Preserving, enhancing, and restoring the San Francisco Bay Area's waters for over 50 years*

goals as stated are protective if the least terns only feed in the lagoon 10% of the time. In addition, the numerical cleanup goals do not take into account the least terns being exposed to contaminants from other areas. Please include a sentence clarifying the assumptions.

5. **Page 7, Table 1 Remediation Goals for Seaplane Lagoon, Remediation Goal, PCBs:** Based on the past discussions with the BCT, the Remediation Goal for PCBs should be as follows: 1.13 mg/kg (ppm) as a not-to-exceed number, and 200 µg/kg (ppb) as an average concentration. In addition, staff proposed a technical meeting with the BCT members prior to finalizing the Record of Decision (ROD) to discuss the methods for calculating and complying with the 200 ppb average number (area average) and compliance determination through fish tissue monitoring. Please revise the Draft Proposed Plan to reflect the 200 ppb average number and arrange for a technical meeting prior to the ROD.
6. **Page 7, Remediation Goals, Second Paragraph:** This paragraph stated that “The results of the HHRA indicate that if sediments are remediated to a level that meets the PCB remediation goal developed to protect the least tern [1.13 milligrams per kilogram (mg/kg)], then PCB concentrations in the tissues of small fish would be reduced to levels that are consistent with ambient levels for San Francisco Bay, thus risk to consumers of potentially contaminated sport fish would be mitigated.” By removing the contaminated sediment, Navy can reduce the human health risks from consuming contaminated fish. However, it is unclear to staff how or whether the risk will be completely mitigated to ambient levels in fish. Please clarify.
7. **Page 11, Table 4, Comparative Ranking of final Alternatives:** Alternative 5 should be Dredging/Monitoring/Dewatering/Upland Disposal, instead of Dredging/Monitoring/Dewatering/Upland Confinement. Please revise the Draft Proposed Plan.
8. **Page 13, Applicable or Relevant and Appropriate Requirements (ARARs), The State of California ARARs, First Bullet:** This bullet stated that only Chapter 2, Beneficial Uses, and Chapter 3 Water Quality Objectives for turbidity and dissolved oxygen in the Water Quality Control Plan, San Francisco Bay Basin (Basin Plan) are considered ARARs. Chapter 3 of the Basin Plan also establishes Water Quality objectives for chromium and lead, which are identified as primary risk drivers for Site 17. In addition, Chapter 4 of the Basin Plan specifies the implementation of the objectives established in Chapter 3 of the Basin Plan. Therefore, both Chapter 3 and Chapter 4 of the Basin Plan should be considered ARARs in their entirety. Please revise the Draft Proposed Plan to include the entire Chapter 3 and 4 of the Basin Plan as ARARs.

9. **Page 13, Applicable or Relevant and Appropriate Requirements (ARARs), The State of California ARARs, Second Bullet:** This bullet stated that State Water Resources Control Board Resolution No. 68-16 (Resolution 68-16) is not an ARAR for cleanup of sediment at IR Site 17. Staff disagrees with this assessment. Resolution 68-16 stated “any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters will be required to meet waste discharge requirements which will result in the best practicable treatment or control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained.” The preferred alternative for Site 17 includes dredging, which is an activity that has the potential to degrade water quality and is subject to the requirements of Resolution 68-16. Therefore, Resolution 68-16 is an ARAR. Please revise the Draft Proposed Plan to include Resolution 68-16 as an ARAR.
  
10. **Page 14, Applicable or Relevant and Appropriate Requirements (ARARs), The State of California ARARs, Second Paragraph:** This paragraph stated that SWRCB Resolution No. 92-49 (Resolution 92-49) is not an ARAR for sediment cleanup at IR Site 17 because surface water quality in SPL is considered to be at background levels and sediment is not considered a threat to water quality. Staff disagrees with this assessment. Resolution 92-49 directs the Water Board to ensure that dischargers cleanup and abate the effects of discharges in a manner promoting attainment of either background water quality or the best reasonable water quality if background quality is not feasible *in order to protect beneficial uses*. The beneficial uses at Site 17 include supporting estuarine habitat and preservation of rare and endangered species. The Site 17 ecological risk assessment concluded that cadmium in sediment poses an unacceptable risk to fish in Seaplane Lagoon. In addition cadmium, PCBs, DDX, lead, and chromium were found to pose an unacceptable risk to bird species, including the least tern, a State and Federal listed endangered species. The proposed cleanup is intended to protect beneficial uses; therefore it complies with Resolution 92-49. Please revise the Draft Proposed Plan to include Resolution 92-49 as an ARAR.
  
11. **Page 14, Preferred Alternative:** Alternative 5 is the preferred alternative. Alternative 5 should be Dredging/Monitoring/Dewatering/Upland Disposal, instead of Dredging/Monitoring/Dewatering/Upland Confinement. Please revise the Draft Proposed Plan.

Please contact me at (510) 622-2363 or email [jchuang@waterboards.ca.gov](mailto:jchuang@waterboards.ca.gov) if you have any questions.

Sincerely,



Judy C. Huang, P.E.  
Project Manager

Cc (via US Mail and email):

Mr. Mark Ripperda  
Project Manager  
U.S. EPA Region IX  
75 Hawthorne Street, (SFD-8-2)  
San Francisco, CA 94105-3901

Ms. Marcia Liao  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710

Dr. James Polisini  
DTSC, Human & Ecological Risk Division  
1011 N. Grandview Avenue  
Glendale, CA 91201

Mr. Charlie Huang  
Department of Fish and Game  
1700 K Street, RM. 250  
P.O. Box 944209  
Sacramento, CA 94244

