



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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ALAMEDA POINT
SSIC NO. 5090.3

November 17, 2005

Mr. Thomas Macchiarella, Code 06CA.TM
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

BRAC OFFICE
2005 NOV 22 P 1:58

RE: Draft Former NAS Alameda IR Site 28 - Todd Shipyards Proposed Plan

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document which we received on October 20, 2005. Please find attached our comments and suggestions for revision. If you have any questions, feel free to call me at (415) 972-3029.

Sincerely,

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

Anna-Marie Cook
Remedial Project Manager

enclosure

cc: Marcia Liao, DTSC
Judy Huang, RWQCB
Suzette Leith, EPA
John Chesnutt, EPA

**EPA Comments on the Draft Proposed Plan for Former NAS Alameda
IR Site 28 - Todd Shipyards**

General Comments:

1. EPA is concerned over the length of the Proposed Plans submitted recently. Site 28 is a small site consisting of 3 acres, with no significantly complex environmental problems. Yet the PP is 18 pages in length. Much of the length can be attributed to an overly wordy description of the CERCLA process, redundant information in text and tables concerning remedial alternatives, and lengthy comparison of the nine NCP criteria. The inclusion of ARARs is unnecessary and cumbersome. Please keep in mind that the Proposed Plans should be designed for public review and comment and as such should be fairly short, interesting and informative. Using Site 15 PP as an example, please shorten this and all future PP. Keep the CERCLA process confined to a flow diagram, remove the text description of alternatives and provide this information in a table(s), remove the ARARs section and remove the comparison of the nine criteria.
2. The discussion of remedial alternatives should focus on the preferred remedy and why it should be selected over the others. The other remedial alternatives should only be presented and compared in a table.
3. Even though it is not necessary to include a statement to this effect in the PP, EPA would like to reiterate that a re-opener should be included in the ROD to address any relevant information developed in the Site 20 RI/FS process.

Specific Comments:

1. **Page 2, CERCLA process flow diagram:** There is nothing wrong with this diagram, but the one used in the Site 15 PP was more informative. For small sites, like Site 28, it would cut down on text verbiage to incorporate a summary of investigation work in the flow diagram as was done for Site 15. Recommend shortening the text under "CERCLA Process" to duplicate Site 15 PP and expanding the flow diagram to include a short summary of the process to date.
2. **Page 3, Remedial Investigation Summary:** The railroad fire of 1902 is missing from the potential sources of contamination.
3. **Page 5, first paragraph:** Please remove the phrase "the cancer risk is allowable" and replace it with "the cancer risk is within the risk management range". Same revision for

the sentence following. EPA reiterates our comments from the FS that the HI of 2 for construction workers is not acceptable.

4. **Table 2:** Are the risks presented here cumulative or incremental? Please clarify.
5. **Ecological Risk Assessment:** It is not clear why pesticides and PCBs are a threat to terrestrial receptors, but are not included in the list of COCs in soil under the human health risk assessment text.

The statement that future land use plans are not likely to create suitable habitat for ecological receptors appears unsupported. A recreational scenario likely involves large tracts of open space, possibly of grass covered or bare soil. This condition is likely to attract terrestrial receptors, more so than the current condition of paved lot.

6. **Page 6, Remedial Action Objectives:** The wording in the second part of the first paragraph is confusing. The text states that the BCT concurs that the remediation goals for the Site 28 groundwater "should be" less strict than MCLs. Please revise to "can be" less strict. Additionally, that sentence as a whole does not make sense: The part of the statement "given that risk from groundwater vapors to residents is considered acceptable by EPA" implies that the risk from vapors results in remediation goals being less strict than MCLs. There are no inhalation risks present at the site from vapors in soil and groundwater since the COCs are PAHs and metals.

It would be helpful to know where the RAOs come from -- risk calculations? water quality standards? The levels for arsenic and lead seem too high for aquatic and terrestrial ecological receptors. Please double check with the RWQCB to make sure that the RAOs are suitable for aquatic receptors.

7. **Page 7 and Page 8:** These pages contain duplicative information. It would be easier to read if the text were deleted and the Table 3 revised to include the duration of the ICs and the cost associated with each alternative.
8. **Statements on page 8 and other pages** that ICs will last for at least 30 years are somewhat misleading, as EPA's assumption is that they will be in place indefinitely. The discussion later in the document that says ICs will last about 30 years or until the regulators say it is OK to remove them is acceptable.
9. **Page 8, IC Table, second bullet:** Revise this bullet as it is not clear who is going to be allowed access to monitoring wells and remedial action components.
10. **Page 8:** Delete the text on this page and add duration of ICs and costs to Table 4.

11. **Page 8, Alternative 2:** We reiterate our comments on the FS that groundwater monitoring does not protect the environment or meet ARARs.
12. **Page 10:** It is not appropriate to list out ARARs in a Proposed Plan which is a fact sheet designed to reach a large number of community members. If it were deemed necessary to include a discussion of ARARs in a PP then, to make it appropriate, the Navy should explain what the requirement is, why it is an ARAR, and how it will be used in this cleanup. Here, there is generally only a list of requirements, without any explanation of what they are. This is meaningless for the general public, and confusing even for regulator reviewers. We request that the ARARs discussion be removed from this and all future Proposed Plans.
13. **Page 10, ARARs.** It is not clear why CERCLA 121(d)(2)(B)(ii) is an ARAR, or how it would be applied as an ARAR. Since the Navy is selecting water quality standards in the CTR, NTR, and Basin Plan as ARARs, why does it intend to have alternative concentration limits?
14. Inclusion of PCB ARAR is confusing to the reader as PCBs were hardly mentioned in the text.
15. It's unclear how and why Resolution 88-63 is an ARAR. It is not meaningful to list a requirement like this without saying what it is.
16. **Page 11, ARARs,** reference to the Inland Surface Water Plan is inaccurate, as those plans were thrown out in court. Reference should be to the Implementation Plan for Inland Surface Waters....
17. **Pages 12 and 13:** The comparison of alternatives is not easy to read since the reader is forced to constantly flip back and forth to find out what each alternative is. The PP should contain a more focused discussion that concentrates on how the preferred alternative rates for each criterion, but also gives a clear picture of how other alternatives compare in general, rather than just a recitation of the rating for each alternative number.
18. **Page 12, 13 and 14:** We disagree with some of the ratings for the alternatives in the discussion of the 9 criteria:
 - a. As stated in our letter on the Site 28 FS, we do not agree that Alternative 2 is protective for the GW.
 - b. The word "not" is missing for the evaluation of both GW and soil in the statement "Alternative 1 does have long-term effectiveness of permanence since the soil is left in place."
 - c. Discussion of reduction of toxicity, etc. through treatment is misleading. Neither soil alternative 3 (cap) nor alternative 4 (excavation) involves treatment.

d. Regarding short-term effectiveness of the GW remedies, it is stated that alternative 1 will not have short-term effectiveness because the GW will not be treated, but then it is stated that alternative 2 (ICs) will have short-term effectiveness because ICs can be implemented quickly. However, there is no treatment there either, and it is doubtful whether ICs are effective in either the short or long term for the shoreline GW.

19. **Page 14, Table 6.** We disagree that GW alternative 2 is protective and meets ARARs.
20. **Page 14, bullets on the preferred soil alternative:** We recommend putting the bullets that discuss permanent removal of contaminant mass and reducing concentrations of PAHs and metals before the bullet on ICs.
21. **Page 15:** The discussion of the two sets of GW -- inland and shoreline -- remains confusing. It is clear what the preferred alternative is for the shoreline GW, but there should be a clearer statement that the preferred alternative for the inland GW is ICs.
22. **Page 18, glossary**
 - a. ARAR: Remove "and local".
 - b. HI: Change "protective of HH" to "acceptable risk for HH."

Editing:

1. **Page 5,** first indented paragraph beginning "The federally established....." The second sentence should not start with "For."
2. **Page 11,** need to removal of underlining under "Compliance with ARARs."
3. **Page 12, item 3,** "do not requiring land use restrictions" should be "do not require."