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ALAMEDA POINT
SSIC NO. 5090.3

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Ser BPMOW.SP\0071
January 30, 2006

Mr. Anna-Marie Cook
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Ms. Marcia Liao
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Ms. Judy Huang
Regional Water Quality Control Board
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Oakland, CA 94612

Dear Alameda Point Federal Facilities Agreement Members:

Subj: DRAFT FINAL PROPOSED PLAN FOR FORMER FIRE FIGHTER TRAINING AREA (IR SITE 14), FORMER NAS ALAMEDA, ALAMEDA POINT, CALIFORNIA AND RESPONSE TO COMMENTS

Enclosed is a copy of the Draft Final Proposed Plan for Site 14 and Response to Comments. The Navy has incorporated your comments on the Draft Proposed Plan into this version. In agreement with my letter to the FFA Members of January 18, 2006, the submittal date for this document was changed to January 30, 2006 when the FFA members agreed to the Department of Toxic Substances Control (DTSC) request for an extended review period.

Please note that this Draft Final Proposed Plan is not suitable for public release. In accordance with Section 10.2 of the Federal Facility Agreement, this document is scheduled to become final on March 2, 2006. If you have any questions or comments, please call Mr. Steven Peck at (619) 532-0786 or me at (619) 532-0907.

Sincerely,

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

Encl: (1) Draft Final Proposed Plan For Former Fire Fighter Training Area (IR Site 14) Former NAS Alameda, Alameda Point, California, January 30, 2006 and Response to Comments

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LETTER\30 JAN 06

A vertical stack of handwritten signatures and initials in the bottom right corner. From top to bottom: a signature that appears to be 'Vh', a signature that appears to be 'Jue', a signature that appears to be 'S', a signature that appears to be 'JP', and a signature that appears to be 'BT'.

RESPONSES TO REGULATORY AGENCY COMMENTS ON THE DRAFT PROPOSED PLAN, FORMER FIRE FIGHTER TRAINING AREA, INSTALLATION RESTORATION SITE 14, ALAMEDA POINT ALAMEDA, CA

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 San Francisco Bay Regional Water Quality Control Board, (Water Board), on the "Draft Proposed Plan, Former NAS Alameda IR Site 14 – Former Fire Fighter Training Area," dated October 2005. The Navy received the comments addressed below from EPA and the Water Board on November 21, 2005.

RESPONSES TO EPA COMMENTS

Comments provided by Anna-Marie Cook, Remedial Project Manager

General Comments

1. **Comment:** The preferred remedial action should clean up 1,2 DCE and 1,1, DCA in addition to vinyl chloride. While the inhalation risk is primarily due to vinyl chloride, DCE and DCA will break down to vinyl chloride in time and may necessitate restart of remedial action to bring levels of vinyl chloride again down to 15 ug/l.

Response: In addition to vinyl chloride, the preferred remedial action is designed to remediate 1,2-dichloroethene (1,2-DCE) and 1,1-dichloroethane (1,1-DCA). The proposed plan will be revised to reflect this information.

2. **Comment:** The case for PAHs not being COCs is incorrectly made throughout this PP. On page 4 (first paragraph and seventh paragraph) the apparent reason for not taking action to clean up PAHs is that they are not site related and their presence can be attributed to dredged material used as fill. However, on other portions of the base, PAHs present in fill from dredged materials are being cleaned up, so that line of reasoning is not solid. Rather, state, in a fashion similar to that presented in the Site 15 PP, that PAHs are present in the soil at levels below the threshold action level of 1.0 ppm and below the site average action level of 0.62 ppm. These low concentration levels provide a sound reason for taking no action.

Response: Under "Human Health Risk Assessment" in the proposed plan, text regarding polynuclear aromatic hydrocarbons (PAH) not specifically being associated with site activities will be deleted (page 4 of the draft). Text also will be added under this section and under "Remedial Investigation and Soil Removal Action Summary" (page 4 of the draft) stating that the average site concentration of PAHs is below 0.62 milligrams per kilogram (mg/kg). Although the average site concentration of PAHs is below 0.62, the maximum PAH concentration detected at Site 14 was 1.2 mg/kg.

3. **Comment:** 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.

Response: The Navy believes that inclusion of applicable or relevant and appropriate requirements (ARAR) in the proposed plan is appropriate, and Navy and EPA counsel have come to an agreement regarding inclusion of the ARARs.

Specific Comments

1. **Comment:** Page 1, first paragraph: Please mention that DCE and DCA will also be remediated through the preferred alternative.

Response: As requested, the text of this paragraph will be revised to indicate that the preferred remedial action will also reduce 1,2-DCE and 1,1-DCA.

2. **Comment:** Figure 3: It is not obvious that the excavated area refers to the dioxin soil removal action. Please expand the description in this figure to make that fact apparent because the removal action is a key component for no further soil action at this site.

Response: The excavation label on Figure 3 will be relabeled as dioxin soil removal action excavation, and the figure will be referenced in the text summarizing the removal action.

3. **Comment:** Page 3, boxed Removal Action: It is a good idea to highlight the removal action by placing it in a text box like this. However, a few more facts should be included in this key paragraph. The depth to which soil was removed should be given. Also, the Navy should clearly state that the eco clean up number was much lower than the human health clean up number and the removal action is very protective from that standpoint.

Response: The requested information will be added to the removal action text box.

4. **Comment:** Page 4, first paragraph: See general comment #2. Also, please verify the concentrations given for the low end of the PAH sampling results here. Did the lowest sample result really come in at 0.11 ug/kg or 0.00011 ppm? It does not seem technically possible at this time to get such a low detection limit for PAHs. In addition, please change the units to mg/kg or ppm which is the more usual manner to present soil concentrations and one that all other PPs use. Presented in ppb, the numbers at a glance look alarmingly large because we are all used to seeing soil concentrations in ppm.

Response: The detection limit of 0.11 micrograms per kilogram ($\mu\text{g}/\text{kg}$) was incorrect and will be revised to 0.011 mg/kg (11 $\mu\text{g}/\text{kg}$). PAH concentrations at Site 14 also will be presented in units of mg/kg rather than $\mu\text{g}/\text{kg}$. Additional language suggested in EPA's General Comment 2 will be added.

5. Comment: Page 4, sixth paragraph: Please delete the sentence “When risk is below 10^{-4} , action is generally not warranted by U.S. Environmental Protection Agency.” or change 10^{-4} to 10^{-6} . In the subsequent sentence define what is meant by the risk management range by adding “i.e. between 10^{-6} and 10^{-4} ” after the phrase “When risk is within the risk management range,”.

Response: The text in this paragraph will be revised to state, “According to the U.S. Environmental Protection Agency (EPA), for sites where the cumulative site risk for future and current land use is less than 10^{-4} , action generally is not warranted; however, action may be warranted if a chemical-specific standard that defines acceptable risk is violated or if there are non-cancer effects or adverse environmental impacts that warrant action. When the risk is within the risk management range, between 10^{-4} to 10^{-6} , site-specific factors are considered when making decisions about whether action is required.

6. Comment: Page 4, seventh paragraph: Specify that arsenic in soil is found at concentrations similar to that of background soil and thus is not related to site activities. Also, change the reasoning for not considering PAHs COCs as per general comment #2.

Response: The text will be revised to state that arsenic concentrations in soil at Site 14 are similar to background concentrations. In regard to PAHs as COCs, please see the response to EPA general comment 2.

7. Comment: Page 5, first paragraph, item #3: For completeness, please add the phrase “Although the FWBZ qualifies as a Class II aquifer under federal guidelines” at the beginning of this item.

Response: The requested revision will be made.

8. Comment: Page 5, first two complete paragraphs: EPA suggests that the following wording be used “Even though consumption of the groundwater is not likely, the remedy needs to protect against accidental ingestion of the groundwater, in addition to protection from the inhalation risk; however, EPA concurs with the selection of ISCO as the remedy for this site.”

Response: This text referring to the remedial goal has been removed from the human health risk assessment section of the proposed plan, and a revised rationale has been provided under the remedial action objective section of the draft final proposed plan.

Text on page 11 indicates that the BRAC Cleanup Team concurs with the selected remedy.

9. Comment: Page 6, Remedial Action Objectives: See general comment #1.

Response: Text will be added to the remedial action objective section stating that the preferred remedial action is designed to remediate 1,2-DCE and 1,1-DCA.

10. Comment: Page 6, second to last sentence on page: It is unclear what the difference is between performance monitoring and post-remediation monitoring? Please clarify.

Response: The proposed plan will be revised to clarify the difference between performance and post-remediation monitoring. Performance monitoring would be done as part of the in situ chemical oxidation (ISCO) treatment, and may include analysis of treatment chemicals and other parameters to determine specific requirements for ISCO injections, including possible re-injections. Performance monitoring may include the collection of samples from injection wells. Post-remediation monitoring would be performed at existing and new permanent monitoring wells. The purpose of the post-remediation monitoring would be to demonstrate that the remedial effort met its intended objectives.

11. Comment: Page 7, Table 2, second bullet: Please clarify who is being allowed access to extraction and monitoring wells.

Response: The text will be revised to state that the Navy, its contractors, and the regulators will have access.

12. Comment: Page 7, Table 2, fourth bullet: Replace the word “restrict” with “prevent”.

Response: The text regarding institutional controls has been updated to reflect Navy’s current position and to be consistent with other proposed plans.

13. Comment: Page 7 ARARs:

a. CERCLA 121(d)(2)(B)(ii) is not an ARAR. Additionally, including this as an ARAR raises for the first time the issue of entry of groundwater to surface water as being a problem that needs remediation.

b. 40 CFR 131.36(b) and 131.38 again brings up the issue of discharge to Oakland Inner Harbor as a problem that was not discussed in the FS. Why is it included in the PP?

c. It is not clear why RCRA requirements in 42 USC 6901 to 6991(i) are listed in the PP. Please explain why these are ARARs.

d. Again, why are substantive portions of various California water plans and code sections listed in the PP? They weren’t evaluated in the FS and the relevance isn’t explained.

Response: The text regarding ARARs has been updated to reflect Navy’s current position and to be consistent with other proposed plans.

14. Comment: Page 9, last sentence: There is a formatting problem at the end of this sentence before continuing to the next page.

Response: The formatting has been corrected.

15. **Comment:** Page 11, bulleted items: There is a stray sentence fragment above the first bullet.
- Response:** The sentence fragment has been deleted.

RESPONSES TO WATER BOARD COMMENTS

Comments provided by Judy C. Huang, P.E., Project Manager

1. **Comment:** Page 7, Federal ARARS, Third Paragraph, Third Sentence: This paragraph stated: “Additionally, the San Francisco Regional Water Quality Board and the East Bay Municipal Utility District have indicated that the first water bearing zone, which is the shallow aquifer containing groundwater contamination, would not be used as a drinking water source.” Water Board staff has not made the determination that the shallow aquifer at Site 14 would not be used as a drinking water source. In our July 2003 letter to the Navy, we only stated that the quality and nature of the groundwater in the first and second water bearing zones beneath Alameda Point west of Saratoga Street are such that these waters are not potential sources of drinking water pursuant to State Board Resolution No. 88-63 and Regional Board Resolution 89-39. Please revise the Draft Proposed Plan to more accurately reflect Water Board’s determination.
- Response:** The text will be revised to reflect that the Water Board has stated that the nature and quality of the groundwater in the first and second water-bearing zones beneath Site 14 are such that these waters are not potential sources of drinking water pursuant to State Board Resolution No. 88-63 and Regional Board Resolution 89-39.

RESPONSES TO DTSC COMMENTS

Comments provided by Marcia Liao, Project Manager

1. **Comment:** Need for Further Action for Soil: Shallow soil collected 2 to 3 feet below ground surface near the plume center was found to contain approximately 2 mg/kg of tetrachloroethene (PCE). This is almost three orders of magnitude higher than the soil screening level established for PCE (0.0003 mg/kg), suggesting a likely continuing source of volatile organic contaminants (VOCs) to groundwater. DTSC appreciates that the Navy address this by stating in the RTC that the remedial alternative chosen for IR Site 14 will address the presence of chlorinated VOCs in soil (see page F-6 of the RTC).

This intent is, however, not communicated in the PP. In fact, page 1 of the PP states, “The proposed plan includes no further action for soil. Please resolve this discrepancy.

Response: The proposed plan will be revised to state that the contamination in the saturated zone of soil will be addressed by the groundwater remedial action. However, the Navy does not agree that further action for soil above the saturated zone is necessary or that such soil presents a continuing source of volatile organic compounds (VOCs) in groundwater. The concentration of 2,100 micrograms per kilogram ($\mu\text{g}/\text{kg}$) of tetrachloroethene (PCE) was detected in a single sample collected in 1994 from a depth of 2.5 to 3.5 feet below ground surface (bgs) at sampling location M101-C. The water table can rise up to 3 feet bgs. PCE concentrations in soil samples collected at 0 to 1.0 and 4.5 to 5.5 feet bgs, at that location, showed concentrations of 1 and 90 $\mu\text{g}/\text{kg}$, respectively. In addition, soil samples collected in 1991 while installing well M101-A, which is adjacent to M101-C, showed no detectable concentrations of PCE. The Navy’s position on this issue is further supported by an observed decreasing trend of VOC concentrations in groundwater; no such trend should occur if there was a continuing source in soil.

2. **Comment:** **SWMU Evaluation: DTSC has completed the SWMU review for IR Site 14. Below are our comments.**

GAP 11: DTSC concurs with no further evaluation (NFE) at Generator Accumulation Point (GAP) 11 on the basis that 1) the storage was on concrete, 2) GAP 11 supported small arms cleaning operation at Building 26 which can be reasonably assumed to be small in scale, and 3) soil and groundwater samples collected in the vicinity do not suggest that GAP 11 is a potential source of groundwater contamination.

GAP 9: DTSC recommends further evaluation of GAP 9 based on the following: 1) GAP 9 was the waste accumulation point for a heavy equipment and vehicle maintenance shop (Building 528). The operation can be reasonably assumed to be sizable. 2) The RCRA Facility Assessment (RFA) concluded that GAP 9 exhibited a high potential for releases since it was outdoor, on sandy soil, and without secondary containment. Stains were visible during the RFA inspection. 3) Sampling performed during previous investigations was insufficient to evaluate GAP 9 as a potential source. Soil samples were either collected on the surface (GAP 9B-1, 9B-2, 9B-3, 9B-4) or not analyzed for VOCs (S14-DGS-DP14, -DP15). DTSC requests that soil and groundwater samples be collected directly beneath GAP 9 as part of the remedial design.

WD-528: DTSC concurs with NFE at WD-528 on the basis that subsurface soil and groundwater samples collected directly beneath and in the immediate vicinity of WD-528 do not suggest WD-528 to be a potential source.

Response The Navy concurs with the comments regarding generator accumulation point (GAP)-11 and washdown area (WD)-528; however, the Navy believes that further evaluation is not warranted at GAP-9. Groundwater from three sampling locations (S-14-4-1, S-14-4-2, and S14-DGS-11), which are near GAP-9, were analyzed for VOCs. Vinyl chloride concentrations in groundwater from these locations do not exceed the remedial goal for vinyl chloride, and the concentrations of other VOCs are low. These groundwater results indicate that a groundwater plume is not present in the vicinity of GAP-9; therefore, there is no indication that GAP-9 is a potential source of contamination. The proposed plan will be revised to indicate that the Navy and DTSC agree that GAP-11 and WD-528 do not require further evaluation, and that the Navy recommends no further evaluation of GAP-9.

The Navy is seeking DTSC's concurrence with no further evaluation of GAP-9 based on this info and requests a meeting or teleconference to discuss further if necessary.

3. **Comment:** **Lateral Extent of PCE in Shallow Soil and Groundwater: DTSC requests that the lateral extent of PCE in shallow soil as referenced above is delineated as part of the remedial design so that recontamination of the groundwater due to remaining soil sources will not occur. DTSC also requests that the extent of contamination in shallow groundwater immediately upgradient of well M101-A is confirmed as part of the remedial design.**

Response Further delineation of the groundwater plume will be added to the proposed plan. However, as discussed in the response to DTSC comment 1, the Navy believes that soil has been adequately characterized at the site. The remedial design will include an evaluation of the contamination in the saturated zone of soil, and it will be addressed through the groundwater remedial action.

4. **Comment:** **Vertical Extent of Groundwater Contamination: DTSC disagrees that the vertical extent of groundwater contamination has been delineated in the hot spot at IR Site 14. It is unclear upon what data the targeted depth interval for remediation is based. DTSC is concerned that if the targeted depth interval is not sufficiently defined, post-remediation recontamination of the shallow groundwater may occur. DTSC requests that depth-discrete groundwater sampling is performed in the hot spot as part of the remedial design.**

Response Further delineation of the groundwater plume will be added to the description of the preferred alternative in the proposed plan. As discussed in the feasibility study (FS) report, groundwater within the first water-bearing zone (FWBZ) is targeted for remediation.

5. **Comment:** **Maximum Contaminant Levels (MCLs) as Applicable or Relevant and Appropriate Requirements (ARARs): DTSC concurs with the United States Environmental Protection Agency (USEPA) that MCLs should be included as ARARs for IR Site 14 because of the Class II aquifer determination. However, given the proposed re-use**

and the proximity to the Oakland Inner Harbor, DTSC is willing to consider non-MCLs cleanup goal and will defer to USEPA on this issue.

Response: The Navy acknowledges DTSCs position, adding that the U.S. Environmental Protection Agency's (EPA) appears to be amenable to setting remedial goals above maximum contaminant levels (MCLs) provided that risks from inhalation of vapors and dermal contact with groundwater are addressed. In addition, the San Francisco Bay Regional Water Quality Control Board (Water Board) has indicated that the FWBZ and second water-bearing zone beneath Site 14 contain water with high total dissolved solid contents due to naturally occurring saltwater intrusion, and it is not reasonably expected by the Water Board that the groundwater would be used as a source of drinking water.

6. **Comment:** Vinyl Chloride as the only COC: As noted in the comment letter dated April 29, 2005, DTSC was unable to concur that vinyl chloride was the only chemical of concern (COC) because, among a variety of concerns, the recent groundwater monitoring data were not provided. The Navy has since included the monitoring data in the final supplemental FS but declines to reconsider the appropriateness of COC identification.

Based on the review of the monitoring data (Appendix E to Final Supplemental FS), DTSC has concluded that: 1) vinyl chloride may not be considered the only COC, and 2) all COCs originally identified in the remedial investigation (RI) should continue to be regarded as COCs for IR Site 14. Our rationale is as follows:

- Under most circumstances COC identification should be based on the complete site characterization data set (i.e. RI data). Recent groundwater monitoring data should be used to affirm or supplement, but not exclude or replace, the RI data.
- Three out of five wells selected for the monitoring (M14-01, M14-02, M112-A) are located outside of the plume boundary and therefore are irrelevant to the COC identification.
- Groundwater contaminant concentrations reported in the final FS supplement (e.g. page ES-3) were generated by averaging the data from all five wells, including the three wells located outside of the plume. This introduces obvious bias and is therefore inappropriate.

Constituents such as tetrachloroethene (PCE), trichloroethene (TCE), and 1,2-dichloroethene (1,2-DCE) are dropped out of the COC list because their concentration levels after averaging were "below" the maximum contaminant levels (MCLs). This is misleading.

Response: Recent groundwater monitoring data were not used to exclude or replace the RI data set or to exclude trichloroethene (TCE), PCE and 1,2-dichloroethene (1,2-DCE) as chemicals of concern (COCs) for Site

14 groundwater. As indicated in the final supplement to the FS report, the elimination of domestic use of groundwater as complete exposure pathways at Site 14 led to a revised risk assessment for the migration of groundwater vapors to indoor air exposure pathway. The methodology used in the revised risk assessment, presented in the final supplement to the FS report, was the same as that used in the original risk assessment, presented in the RI; however, the revised risk assessment followed the agencies' request to use groundwater data rather than soil gas data. Also, the revised risk was conservatively assessed using the original groundwater data set, as presented in the RI, thus excluding recent groundwater monitoring data with lower concentrations. This risk assessment concluded that the only COC for groundwater is vinyl chloride. With the elimination of the domestic use of groundwater pathways, TCE, PCE and 1,2-DCE are no longer COCs.

7. **Comment:** **Remedial Action Objectives (RAOs): The development of RAOs should take into account all COCs identified in the RI. Please revise the RAOs accordingly. It is our opinion that while RAOs should be established for all COCs, the need for sampling the COCs can actually be limited to a suite of indicator chemicals to reduce the analytical costs.**

Response: The proposed plan identifies vinyl chloride as the only COC, and supports that finding by presenting summaries of the FS report and the final supplement to the FS report, including the revised risk assessment. The proposed plan will be revised to reflect that in addition to vinyl chloride, the preferred remedial action will also reduce the concentration of 1,2-DCE and 1,1-dichloroethane (1,1-DCA).

8. **Comment:** **Time Required to Reach RAOs: Page 6 of the PP states, "The ICs would remain in place until the RAO has been achieved which would require 6 years (1 year for active treatment, 3 years for performance monitoring, and 2 years of post-remediation monitoring)." Please note DTSC measures the success of remediation (i.e. achieving the RAOs) with a series of clearly defined performance standards. Timetables such as the one suggested here are inherently hypothetical because they involve numerous assumptions. This uncertainty should be clearly conveyed in the PP.**

Response: The proposed plan will be revised to state that although institutional controls (ICs) were estimated at 6 years, ICs would remain in place until remedial action objectives and remedial goals established in the record of decision (ROD) have been achieved.

9. **Comment:** **Performance Standards: The PP should point out that the Record of Decision (ROD) will specify the following performance standards to ensure success of the remediation:**

- **Shut down criteria, which will establish the target concentrations upon which the in-situ chemical oxidation (ISCO) treatment system can be turned off and monitored natural attenuation (MNA) can commence. The criteria**

should include: 1) target concentrations for both groundwater and saturated soil media (e.g. 95 to 99 % reduction from the pre-treatment concentration levels) and 2) the time interval allowed to reach the target concentrations,

- End point determination of success, which considers rebounds of contaminants and specifies a time interval that should be allowed before declaring the RAOs are met.

Contingency for failure, which establishes the criteria for restarting the treatment system after a certain period of unsuccessful attenuation.

Response: The proposed plan will be revised to indicate that the ROD specifies performance standards; however, the Navy believes that the level of detail provided in the comment is not appropriate for the proposed plan.

10. Comment: Remediation Areas: Please provide a map showing the proposed remediation areas in the PP.

A map will be added to the proposed plan to show the proposed remediation areas.

11. Comment: Institutional Controls (ICs): ICs prohibiting extraction of groundwater for all uses into perpetuity will have to be put in place if the RAO is developed solely based on the inhalation exposure pathway. The only exception to this prohibition is groundwater extraction incidental to construction activities. In that case, measures pursuant to the groundwater management plan developed as part of the ICs will have to be followed.

Response: The Navy plans to use ICs as an extra measure above and beyond the Tidelands Trust to ensure that the property is restricted from residential use until the remedial goals are met. The ICs can be removed once the remedial goals are met. At this site, the RME does not include ingestion as a potential exposure pathway; therefore, an IC is not required to manage the risk of an incomplete pathway.

12. Comment: Petroleum Cleanup: Although petroleum is excluded and no remedy for petroleum contamination is required under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), it is appropriate that the PP discusses petroleum contamination and its mitigation at IR Site 14 to provide the community with a better understanding of the site. DTSC recommends that the PP indicates that the Navy will work with California Regional Water Quality Control Board (RWQCB) for the following:

- Appropriate screening criteria and suitable remedial measures to address any residual petroleum contamination left on site (Elevated petroleum concentrations have been reported at various locations at IR Site 14. For example, diesel as high as 2,000 ug/L was detected at a groundwater sample collected at WD-528. Soil collected from GAP 9B-3,

on the other hand, showed 27,000 mg/kg of motor oil).

- Proper closure determination of three petroleum-related SWMUs, namely, AOC 357, AST 179, and AST 528.
- Proper closure determination of Petroleum Corrective Action Area 2 (CAA-2)

As stated in DTSC letter dated June 13, 2005, RWQCB is the lead state regulatory agency for petroleum-only cleanup. DTSC, being a support agency to the RWQCB on such cleanup, will work with the RWQCB to ensure that requirements of both Chapter 6.5 and Chapter 6.8 of California Health and Safety Code (HSC) are met.

Response: The proposed plan will be revised to indicate that the Navy is working with the Water Board to secure closure of the petroleum issues and that presently five of the six sites have a no further action closure pending before the Water Board.

13. **Comment:** **Impact to Ecological Receptors: DTSC agrees that the ecological hazard at IR Site 14 is fairly minimal. This is based on the small size of Site 14, the projected future use as recreational area and the ecological risk assessment (ERA) hazard quotients are marginally above 1.0 in most cases. However, fragmenting the area along the Oakland Inner Harbor into geographically separated areas does not present a full picture of any potential ecological hazard. DTSC requests that proper statement is included in the PP and ROD to indicate that area-wide ERA, including Site 14 and the other contiguous areas, will be conducted prior to transfer and remedy at other sites may need to be more aggressive as a result.**

Response: No change was made to the proposed plan based on this comment. The purpose of this proposed plan is to present the Navy's preferred alternative, the alternatives that were evaluated, and to solicit public comments for Site 14. The Navy believes that it is not appropriate to mention activities associated with other sites in this proposed plan. In addition, the Navy does not believe an area-wide ecological risk assessment is necessary.

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Steven Bradley, Contract Manager

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ENCLOSURE 1

DRAFT FINAL PROPOSED PLAN FOR FORMER
FIRE FIGHTER TRAINING AREA, IR SITE 14

DATED 01 FEBRUARY 2006

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