



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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San Francisco, CA 94105
SFD 8-3

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SSIC NO. 5090.3

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November 21, 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

RE: Draft Proposed Plan Former NAS Alameda IR Site 14 - Former Fire Fighter Training Area

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document which we received on October 21, 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, appearing to read "Anna-Marie Cook".

Anna-Marie Cook
Remedial Project Manager

enclosure

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

**Draft Proposed Plan Former NAS Alameda IR Site 14
Former Fire Fighter Training Area**

General Comments:

1. 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.
2. 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.
3. 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.

Specific Comments:

1. **Page 1, first paragraph:** Please mention that DCE and DCA will also be remediated through the preferred alternative.
2. **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.
3. **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.
4. **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.

5. **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,”.
6. **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.
7. **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.
8. **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.”
9. **Page 6, Remedial Action Objectives:** See general comment #1.
10. **Page 6, second to last sentence on page:** It is unclear what the difference is between performance monitoring and post-remediation monitoring? Please clarify.
11. **Page 7, Table 2, second bullet:** Please clarify who is being allowed access to extraction and monitoring wells.
12. **Page 7, Table 2, fourth bullet:** Replace the word “restrict” with “prevent”.
13. **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.

14. **Page 9, last sentence:** There is a formatting problem at the end of this sentence before continuing to the next page.
15. **Page 11, bulleted items:** There is a stray sentence fragment above the first bullet.