



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
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ALAMEDA POINT
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Gray Davis
Governor

June 24, 2002

Glenna Clark
BRAC Operations, Code 06CA.GC/0718
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

**DRAFT ACTION MEMORANDUM, NON-TIME CRITICAL REMOVAL ACTION, LEAD
IN SOIL AND LEAD BASED PAINT, PARCELS 79, 98, 105, 106 AND 107, ALAMEDA
POINT, ALAMEDA, CALIFORNIA**

Dear Ms. Clark:

The Department of Toxic Substances Control (DTSC) has reviewed the above referenced document prepared by Tetra Tech EMI and submitted by the Navy on May 21, 2002. Enclosed are our comments. If you have any questions, please contact me at 510-540-3767.

Sincerely,

Marcia Y. Liao

Marcia Liao, Ph.D., CHMM
Hazardous Substances Engineer
Office of Military Facilities

enclosure

Ms. Glenna Clark

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cc: Michael McClelland, SWDiv
Andrew Dick, SWDiv
Steve Edde, Alameda Point
Anna-Marie Cook, EPA
Judy Huang, RWQCB
Elizabeth Johnson, City of Alameda
Peter Russel, Northgate Environmental
Michael John Torrey, RAB Co-Chair
Lea Loizos, Arc Ecology
Chris Fennessy, Tetra Tech EMI

**DTSC COMMENTS
DRAFT ACTION MEMORANDUM
NON-TIME CRITICAL REMOVAL ACTION
LEAD IN SOIL AND LEAD BASED PAINT
PARCELS 79, 98, 105, 106 AND 107
ALAMEDA POINT, ALAMEDA, CALIFORNIA**

GENERAL COMMENTS

1. DTSC disagrees with the statement "The chemical of concern (COC) at these sites is lead" (see page 1-1, paragraph 1) because it implies that lead is the only chemical of concern at the subject sites. We further disagree with the statement, "The Navy, with consultation from the Base Cleanup Team (BCT), determined that lead is the chemical of concern (COC) at these sites" (see Response to Agency Comments dated May 21, 2002 which is in Appendix E to the EE/CA which, in turn, is Appendix B to the Action Memorandum).

As stated in our comments dated March 25, 2002 and April 24, 2002, lead based paint (LBP) may contain COCs other than lead which may impact the cleanup. DTSC does not disagree that lead drives the cleanup. We are just concerned that lead may not be the sole driver and therefore would like to see the presence of other COCs be taken into account.

Specifically, we recommend the Navy review the Material Safety Data Sheet (MSDS) or its equivalent for LBP to positively identify the COCs at the subject sites. If COCs in addition to lead are confirmed, we further recommend the Navy:

- ◆ Expand analytical parameters in the confirmation sampling to include all COCs.
 - ◆ Demonstrate in the closeout report that a Preliminary Remediation Criteria (PRC) of 199 mg/kg of lead is adequately protective of human health. This is especially relevant to Parcel 98, which is to stay residential for the next 50 years, and the proposed day care facility to be constructed on site.
2. DTSC disagrees with the statement "This removal action is anticipated to be the final remedial action for lead at these parcels" (see Page 1-1, paragraph 2). As stated in our comments dated March 25, 2002 and April 24, 2002, DTSC is concerned that soil underneath the pavement may be impacted. Unless proven clean, it is our position that any lead contamination not taken care of by this removal action will be addressed in the final remedy or Record of Decision (ROD) for Alameda Point.

According to the development history provided in Table 2-1 and Page 2-1, the three water towers were constructed in 1933 while the pavement was installed about seven to 14 years later, i.e., between 1940 and 1947. It is therefore less

than accurate to state “These structures were all constructed in the 1940s and 1950s ...” (page 2-1, paragraph 3) and “... most of the pavement ... was installed at roughly the same time as the towers” (page 2-4, paragraph 4).

DTSC believes it is prudent to assume, until proven otherwise, that the soil beneath the pavement is impacted. This belief also extends to Building 23. At this time the age of Building 23 has not been established. If constructed after the antenna tower 036B, it is possible that the soil underneath Building 23 is also impacted.

3. DTSC would like to comment on the statement, “...this removal action is consistent, to the maximum extent possible, with Chapter 6.8 of the California Health and Safety Code (Ca-HSC)” (see page 1-1, paragraph 2).

Please be advised that DTSC expects State requirements be fully met in any cleanup efforts taking place at Alameda Point. Should circumstances arise rendering the full compliance with State requirements infeasible, we will consider a waiver on a case-by-case basis. In other words, the caveat “to the maximum extent possible” is tied directly to an objective assessment of feasibility, and DTSC reserves the right to concur on determinations of infeasibility.

PAGE SPECIFIC COMMENTS

1. **Page 2-5, paragraph 1:** Section 2.4 should be Section 4.1 instead.
2. **Page 2-5, paragraph 4:** The proposed depth of excavation at the tower sites is now typically 6 inches deeper than the sample depth. It is unclear why the subject Action Memorandum still states, “The depth of the removal areas are defined based on the sample depths where these contaminants were encountered. Because lead has low mobility in soil, there is no reason to expect these contaminants to be present at greater distances from sample points or at depths greater than those included in the preliminary removal areas”. Please explain.
3. **Page 3-1, last sentence and Page 3-2, line 15:** Please insert “or may be deeper” at the end of the sentence “Lead contaminated soil exists from ground surface to 1.5 feet bgs”.
4. The EE/CA has used the term preliminary remediation criteria (PRC). This Action memorandum uses preliminary remediation goal (PRG) and removal action objective (RAO). If possible, please keep the terms consistent.
5. **Page 4-2, line 25:** The term “lead in soil” is confusing. Please clarify if it refers to the input parameter of “lead in soil/dust” in LeadSpread 7 model.
6. **Page 4-2, line 25:** DTSC has no default value for lead. Please clarify what “DTSC default value” means.

7. DTSC second round of comments is dated April 24, 2002, not April 8, 2002. Please revise the appropriate page in Appendix E to the EE/CA which is referred as Appendix B to this Action Memorandum.

8. The legends for some sample locations and offset sample locations appear to be incorrect. Examples include SS-36B-NW25, SS-36B-NE25 and SS-36B-NE50 of Figure 2-3. Please revise as appropriate.