



July 1, 2005

Thomas Macchiarella
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1220 Pacific Highway
San Diego, CA 92132-5190

Dear Mr. *Thomas* Macchiarella:

The Alameda Reuse and Redevelopment Authority (ARRA) is pleased to comment on the Navy's May 5, 2005 Revised Draft Feasibility Study Report, IR Site 1, 1943-1956 Disposal Area, Alameda Point, Alameda, California (Revised Draft FS). ARRA's Reuse Plan specifies recreational reuse of IR Site 1, including a golf course, trail, beach, and picnic area. Accordingly, ARRA's comments on the Revised Draft FS address issues of particular relevance to this intended land use.

ARRA's Comments

1. Please delete the Revised Draft FS's conclusion that landfilled wastes are not contributing to groundwater contamination outside the VOC plume area. Appendix F "Groundwater Quality Evaluation" notes that isolated and sporadic exceedances of the CTR (California Toxics Rule) criteria occur outside of the main plume area. Nevertheless, Section F4 of Appendix F asserts there "is not a significant source of contamination in the Area 1 subsurface wastes that is contributing to groundwater contamination outside the VOC plume area." This conclusion is neither supported by available data nor does it recognize the probability of latent releases that have not yet become manifest, such as from landfilled drums as they corrode to the point of failure. There is ample evidence of buried drums in the landfill. For example, Navy's Initial Assessment Study, Naval Air Station Alameda, Alameda, California (Energy and Environment, Inc. April 1983) states "Waste drums were often burned during disposal operations, which suggests that flammable materials were disposed of in this area." This unsupported conclusion about the absence of contaminant sources could lead to a ROD decision that does not require an impermeable cap on the landfill.

Section 6.3.2.1 of the Revised Draft FS states "protection of groundwater quality is not an objective" of Area 1 (waste disposal area) Alternative S1-2 "Soil Cover and ICs". However, even if groundwater beneath the landfill was not a potential drinking water supply, other beneficial uses of groundwater still must be protected. Various ARARs (Applicable or Relevant and Appropriate Requirements) address this issue, including the Clean Water Act, the Porter-Cologne Water Quality Act, the Basin Plan, and the State Water Resources Control Board's Statement of Policy

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with Respect to Maintaining High Quality of Waters in California. This alternative contemplates a variance pursuant to California Code Regulations, Title 22, Section 66264.310(a)(7), which requires a demonstration to the satisfaction of the DTSC (Department of Toxic Substances Control) that a low-permeability cap "is not necessary to protect public health, water quality or other environmental quality." The Appendix F evaluation is intended to demonstrate that the prescriptive cap is not necessary. No variance has been granted by DTSC, nor should it grant one, without further evidence that a cap is not needed to prevent continued degradation of groundwater. A low permeability engineered cap would be more appropriate than a soil cover for water management and other maintenance of the golf course contemplated for IR Site 1 in the Reuse Plan.

2. Please modify Alternative S1-3 "Engineered Alternative Cap and ICs" to address management of potential landfill gas. A landfill gas management system would probably be needed for any impermeable capping alternative. This alternative, so modified, would be most compatible with the Reuse Plan.
3. Please include an alternative for soil in Area 1 (the waste disposal area) that provides for landfill containment. The Navy's previous approach to use the presumptive remedy (Application of the CERCLA Municipal Landfill Presumptive Remedy to Military Landfills, EPA Directive 9355.0-67 FS) as the rationale for limiting the remedial investigation of the landfill is not discussed in the Revised Draft FS. Nor is this directive or related documents listed as an ARAR or a "to be considered" rule. This means that the EPA's call for containment is not addressed in the Revised Draft FS except to the extent capping and a barrier wall are discussed as alternatives. In discussions of alternatives, the Navy eliminates landfill containment. The barrier wall alternative that the Revised Draft FS considers has only one vertical wall, which would not surround the buried wastes. One wall likely would not be effective in containing the contaminated groundwater (leachate). The Revised Draft FS contends that "large debris" makes digging a vertical barrier infeasible. However, no investigation has been conducted of the landfill to verify such "large debris is present." In addition, barrier walls are generally installed outside the limits of the landfilled material, so that the landfill is contained. Therefore, no large debris should be encountered.
4. Please provide one or more alternatives for Area 1 soil (waste disposal area) that explicitly treat Area 1b (burn area) differently from Area 1a (balance of inferred disposal area). This approach is needed because burn area wastes are more likely in contact with the Bay and subject to erosion by waves than are the wastes in the rest of the landfill (Area 1a). For example, a preferred alternative may be to excavate wastes from some or all of the burn area, but to simply cap the balance of Area 1.

Unfortunately, the information is not yet available to decisively select the best alternative. Issues concerning the burned waste, which are discussed in Section 2.1.3.2, are not fully addressed by the Revised Draft FS. The Revised Draft FS discusses sampling of off-shore sediment. The off-shore sampling unlikely encountered the burned material that was pushed into the Bay during landfilling

operations in the 1950's. Rather, the sampling most likely was of sediment that had been deposited since that time. The Revised Draft FS also does not discuss the burn material within the tidal zone that is periodically subject to erosion from storms. Battelle collected additional samples from the burn area and the future beach area in March 2005, too late for inclusion in the Revised Draft FS.

5. Please resolve the conflicting radiological characterizations of IR Site 1. The Revised Draft FS's cleanup options are based on a radiological anomalies study that was performed in 2004. Figure 2-25 shows the locations of radiation anomalies identified in this study. The 2004 study results differ dramatically from the radiation anomaly locations developed from radiation anomaly data collected between August 1998 and 1999 (see Figure 3-2 of Navy's December 12, 2002 Revised Draft Feasibility Study Report). Many fewer anomalies are found in the 2004 study than the previous study. A complete explanation of this apparent discrepancy is needed to assess which study most appropriately provides the basis for selecting a remedy that will be protective of the intended recreational land use.
6. Soil alternatives for Areas 1, 2, 3, and 4 should consider MEC (munitions and explosives of concern) support services, as alternatives addressing the pistol range berm (Area 5) and the radiological cleanup (site-wide) currently do. For example, Alternative S1-2 "Soil Cover and ICs" calls for six inches of scarification (ripping with a dozer) of the landfill area and compaction of the soil before placing the fill cover. This work could encounter MEC and present a danger to workers. MEC have been found in IR Site 1 at various times. Only a surface removal has been performed to date. It is likely that additional MEC items are present slightly below the ground surface.

In addition, DTSC sometimes requires a minimum of four feet of soil cover, if MEC is suspected to be present. Neither the cover nor the cap alternative proposed for Area 1 specifies a thickness of at least four feet.

7. Implementation of Alternative S2-3 "Pavement Maintenance and ICs" would seriously impact the viability of constructing a golf course. This Area 2 (runways) alternative apparently requires the pavement remain accessible for maintenance. Alternative S2-4 "Demolition, Sampling, Hot Spot Removal, and ICs" is most compatible with the Reuse Plan.
8. Area 3 (seasonal wetlands) Alternatives S3-3 "Tier 2 Ecological Risk Assessment and ICs", S3-4 "Tier 2 Ecological Risk Assessment, Hot Spot Relocation, and ICs", and S3-5 "Tier 2 Ecological Risk Assessment, Hot Spot Removal, and ICs" provide for ICs (institutional controls) that would "require that any future soil excavation in Area 3 follow a soil management plan that considers possible subsurface hazards (such as radiological anomalies) and the potential that contaminated soil may be encountered." However, no subsurface investigation has occurred in Area 3 to suggest such an IC is appropriate. Please remove this IC, which would be an encumbrance on recreational reuse of Area 3, unless and until its need is demonstrated.

9. The Revised Draft FS states that additional investigations for such items as the extent of the landfill material and the presence of radiological sources under the runways are required to determine the extent of the remediation. Please acknowledge in the FS that the extent of wetlands filling needed for remediation is currently speculative and will be determined only after the additional investigations are complete.
10. As an editorial comment, the Revised Draft FS commonly refers to Area 1 as the "former waste disposal area". ARRA wishes this were the case. Unfortunately, the wastes are still disposed there, so the word "former" seems inappropriate. This comment also applies to the Areas 2 (runways) and 3 (firing range berm).

ARRA appreciates your thorough consideration of these comments in the interest of returning IR Site 1 to beneficial reuse as expeditiously as possible, consistent with the Reuse Plan. If you have any questions about these comments, please contact either Ted Splitter 510-839-0089, Dr. Peter Russell at 415-492-0540, or myself. Thank you.

Sincerely,


Debbie Potter
Base Reuse and Redevelopment Manager

DP: rr

cc: Judy Huang, RWQCB
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