



Terry Tamminen
Agency Secretary
Cal/EPA



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ALAMEDA POINT
SSIC NO. 5090.3

Department of Toxic Substances Control

Edwin F. Lowry, Director
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721



Arnold
Schwarzenegger
Governor

September 13, 2004

Mr. Thomas L. Macchiarella
Southwest Division Naval Facilities Engineering Command
Attn: Code 06CA.TM
1220 Pacific Highway
San Diego, CA 92132-5190

DRAFT ACTION MEMORANDUM, TIME CRITICAL REMOVAL ACTION, IR SITE 9, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the above referenced document dated August 10, 2004. Our comments are attached. Please contact me at 510-540-3767 or mliao@dtsc.ca.gov if you have any questions.

Sincerely,

Marcia Liao, Ph.D., CHMM
Remedial Project Manager
Office of Military Facilities

Enclosure

SENSITIVE RECORD

PORTIONS OF THIS RECORD ARE CONSIDERED
SENSITIVE AND ARE NOT FOR PUBLIC VIEWING

PRIVATE CITIZENS' E-MAIL ADDRESSES HAVE BEEN
REDACTED IN ACCORDANCE WITH THE PRIVACY ACT

QUESTIONS MAY BE DIRECTED TO:

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SENSITIVE

Mr. Thomas Macchiarella

Page 2

September 13, 2004

Cc (via US Mail and email):

Ms. Anna-Marie Cook
Remedial Project Manager
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Ms. Judy Huang, P.E.
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Cc (via email):

Greg Lorton, SWDiv, Gregory.Lorton@navy.mil
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SENSITIVE



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

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MEMORANDUM

TO: Marcia Liao
Project Manager
Office of Military Facilities

FROM: Harold R. Duke, RG
Engineering Geologist
Northern California Geologic Services Unit

REVIEWED
BY: Mark Vest, RG
Senior Engineering Geologist
Northern California Geologic Services Unit

DATE: September 13, 2004

SUBJECT: GSU REVIEW OF DRAFT ACTION MEMORANDUM, TIME-CRITICAL
REMOVAL ACTION, IR SITE 9 SHALLOW, ALAMEDA POINT,
ALAMEDA, CALIFORNIA

ACTIVITY REQUESTED:

Per your request dated August 16, 2004, the Department of Toxic Substances Control (DTSC) Geologic Services Unit (GSU) has reviewed the document entitled *Draft Action Memorandum, Time-Critical Removal Action, IR Site 9 Shallow, Alameda Point, Alameda, California* (Draft Site 9 TCRA). The report was prepared for the Department of the Navy, Southwest Division Naval Facilities Engineering Command (the Navy), by Shaw Environmental, Inc. (Shaw), Concord, California. The document is dated August 10, 2004.

REVIEW ACTIVITIES

The GSU was requested to evaluate the technical adequacy, content, and completeness of the subject report. Review activities consisted of reading the report, reviewing historical data, and providing comments and recommendations as necessary.

PROJECT SUMMARY

The purpose of the Draft Site 9 TCRA is to document, for the Administrative Record, the Navy's decision to undertake a time-critical removal action (TCRA) to reduce the potential risk of fire or explosion and human health exposure to hazardous substances during the implementation of full-scale in-situ chemical oxidation (ISCO) at Installation Restoration (IR) Site 9, Building 410, within Alameda Point, Alameda, California.

The GSU's comments and recommendations follow below.

SPECIFIC COMMENTS AND RECOMMENDATIONS

1) Section 2.2, Page 2-2, Paragraph 2, Sentence 3: It is stated here that analytical results from a sample collected from well F9SMW04 were "*primarily of JP-5 at 880,000 milligrams per kilogram (mg/kg)*". The GSU questions whether the analysis was of a liquid sample. If so, the analytical result should properly be reported as milligrams per liter rather than mg/kg.

Recommendation

The GSU recommends revising the Draft Site 9 TCRA to ensure the use of correct units of measure for the analytical result reported in Section 2.2 for the sample collected from well F9SMW04.

2) Section 2.2, Page 2-2, Paragraph 4, Sentence 2: It is reported here that there may potentially be floating product present within the industrial waste and/or storm sewer lines that are connected to Building 410. However, there is no recommendation for investigation of the utility lines in the Draft Site 9 TCRA, nor are there any recommendations for removal of floating product in the backfill of the utility lines if encountered. The GSU believes this to be an oversight, especially given the fact that groundwater is shallow at the Site (reportedly 5 feet bgs), and given the statement in Section 2.2 of the Draft Site 9 TCRA that sewer lines are suspected to have been flow pathways for the release of petroleum associated chemicals to the environment.

Marcia Liao
September 13, 2004
Page 3 of 3

Recommendation

The GSU recommends revising the Draft Site 9 TCRA to include an evaluation of all utility lines in the vicinity of the groundwater monitoring wells which contain floating product, and an assessment of remedial alternatives for the removal of floating product from utility lines and backfill material if any is encountered.

3) Section 5.1, Page 5-2, Paragraph 3, Sentence 2: It is stated here that, in addition to the initial 12 dual vacuum extraction (DVE) wells, approximately 20 additional wells will be installed as part of the TCRA to help determine the source and extent of the floating product plume at the site. However, there is no further discussion within the Draft Site 9 TCRA as to how it will be determined where to locate these additional 20 wells.

Recommendation

The GSU recommends revising the Draft Site 9 TCRA to include a discussion of the rational proposed to be used to locate the additional 20 DVE wells discussed in Section 5.1.

If you have any questions, please contact me at 916/255-3695 or at bduke@dtsc.ca.gov.