



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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SFD 8-3

N00236.002543
ALAMEDA POINT
SSIC NO. 5090.3

September 5, 2006

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 for IR Site 27, Dock Zone, Former NAS Alameda

Dear Mr. Macchiarella:

EPA has reviewed the above referenced Proposed Plan submitted by the Navy to the agencies on July 24, 2006. EPA supports the selection of Alternative 6B as the remedy for groundwater cleanup. However, the Proposed Plan could be better written and presented. The information with regard to groundwater designation, definition of human health risk assessment and risk management needs revision. The definition and evaluation of short term effectiveness is incomplete and the presentation of RAOs is confusing. Readability and usefulness of this document would be improved by correcting these issues and addressing the other comments from the agencies.

We look forward to working with you toward the final Proposed Plan for this site. If you have any questions, please call me at (415) 972-3029.

Sincerely,

A handwritten signature in cursive script that reads "Anna-Marie Cook".

Anna-Marie Cook
Remedial Project Manager

cc list: Andrew Baughman, BRAC PMO
Michelle Hurst, BRAC PMO
Dot Lofstrom, DTSC
Judy Huang, RWQCB
Erich Simon, RWQCB
Suzette Leith, EPA
John Chesnutt, EPA

**EPA Review of Draft Proposed Plan for IR site 27, Dock Zone,
Former NAS Alameda**

General Comments:

1. This Proposed Plan could be better written and presented. The information with regard to groundwater designation, definition of human health risk assessment and risk management is inaccurate. Other information such as the definition and evaluation of short term effectiveness and the presentation of RAOs is incomplete and/or confusing.
2. EPA would recommend more clarity as to why no action is being taken for shoreline groundwater. The PP is confusing because the preferred alternative 6B is defined as a "sitewide ISCO", yet is restricted to the "entire inland groundwater" rather than the whole of Site 27. (See page 7). It is also confusing because on page 6, in the paragraph above the box, the PP states that certain alternatives include no action for the shoreline groundwater, but the preferred alternative 6B is not included here.

Specific Comments:

1. **Page 1, first column, first paragraph, second sentence.** Please revise the sentence to state "...is not used for domestic purposes and is not a current drinking water source." The groundwater is designated as a potential drinking water source under both federal and State criteria.
2. **Page 1, first column, second bullet:** The timeframe over which groundwater monitoring will occur is unclear here. Is the groundwater monitoring occurring concurrently with the implementation of the ISCO or is it going to be performed for three years following the completion of the treatment?
3. **Second column, last paragraph.** The statements in this paragraph are incorrect. The groundwater beneath Site 27 has been designated by EPA and the RWQCB as being a potential source of drinking water. The groundwater offsite is also a potential source of drinking water and may be a current source. Please revise this paragraph to accurately reflect the designation of the groundwater.
4. **Page 3, first column, second paragraph:** Is the Navy stating here that current operations at Site 27 are continuing to provide a source of contamination to groundwater? In addition to this concern, EPA continues to find the statement that there are potential upgradient sources of contamination at IR 27 problematic. Making this statement brings up the concern that groundwater sources have not been adequately characterized and that

the treatment of groundwater at Site 27 will not be successful due to recontamination from the upgradient sources. Which sources upgradient does the Navy believe may be responsible for the contamination at Site 27 and what steps have been taken to characterize this source and control its future impact on groundwater at Site 27?

5. **Page 4, first column, last full paragraph, first sentence:** Recommend deleting the word ‘remedy’ and replacing it with the word ‘cleanup’ without the brackets.
6. **Page 4, second column, first paragraph:** The definition of HHRA is incorrect here. The risk is not calculated based on increased cancer cases per thousand people. Please refer to other previously reviewed and approved proposed plans for a more appropriate and accurate description of risk.
7. **Page 5, first column, first sentence:** Please remove the phrase “for acceptable risk” from this sentence. Risks in the risk management range may or may not be determined to be acceptable. That is where the risk management decisions come in to play. There is no standard “acceptable risk” in this range.
8. **Page 6, first column, last paragraph:** All the groundwater beneath Site 27 is classified as a potential drinking water source. EPA and the RWQCB have not portioned out any part of the groundwater for exclusion from this designation.
9. **Page 6, second column, first full paragraph, third sentence:** The wording in this sentence is awkward. I would suggest stating that Alternatives 2, 4B, 5, and 8 were eliminated from detailed evaluation and the remaining alternatives are described in Table 3.
10. **Page 6, second column, second full paragraph:** There has been no action for groundwater yet, so the term *no further action* is not really appropriate here. It would also be helpful to give more information on the shoreline groundwater contamination levels to show that the levels will not recontaminate the inland groundwater post cleanup of the inland groundwater.
11. **Page 6, Table 3:** It is confusing to have two sets of RAOs here. The RAO is to clean up the inland groundwater to MCLs. The shoreline groundwater was determined to not present a threat to surface water based on an ecological and human health risk assessment at the RI stage and no action was deemed appropriate. No alternatives were evaluated for clean up of the shoreline groundwater and it is unnecessary and confusing to provide RAOs for this shoreline water. Please delete from the table.
12. **Page 6, second column, footnote “d”:** Delete the word “and” in this footnote.
13. **Page 8, Table 4:** Temporary ICs similar to those used for Site 26 are needed for the

duration of Alternative 6B for Site 27. Using the phrasing “long-term ICs are not a component...” would correct this problem in the table.

14. **Page 8, Table 4, first paragraph:** There needs to be spacing between the end of the first sentence and the beginning of the second sentence.
15. **Page 8, Criterion 5:** Time to reach RAOs is a factor in the evaluation of Short -Term Effectiveness and in this regard, Alternative 6B is far better than any other alternative.
16. **Page 10, Criterion 5:** Similar concern to the comment above. The duration to reach RAOs has not been included in the description of this criterion, but it is an important component that should be included.
17. **Page 11, second column, second bullet:** Recommend removing the phrase “although possibly less effective in the short term” from this bullet. Inclusion of temporary ICs will make this remedial alternative effective in the short term and the duration to reach RAOs is significantly less than any other alternative evaluated.
18. **Page 11, second column, fourth bullet:** Replace the word “lowest” with the word “shortest”.
19. **Glossary of Technical Terms:** The definition of “Contaminant” has been restricted to groundwater, but contaminants can be found in any media including soil, soil gas and air.