



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
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SFD 8-3

September 21, 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 Record of Decision Site 14, Former Firefighter Training Area, Alameda Point

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document prepared and submitted by the Navy on July 24, 2006. Overall, we find the Record of Decision and the selected remedy to be satisfactory, although we are requesting a few changes. Enclosed are suggestions and requests for revision, clarification and further explanation on some issues. Since the ROD contains Institutional Controls as part of the selected remedy, it is necessary for EPA HQ to review the IC provisions. Comments from EPA HQ have been included.

We appreciate working with you in developing this ROD and look forward to the document going final on December 21, 2006.

Sincerely,

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

Anna-Marie Cook
Remedial Project Manager

enclosure

cc list: Steve Peck, BRAC PMO SW
Dot Lofstrom, DTSC Sacramento
Erich Simon, SFRWQCB
George Humphreys, RAB Co-Chair
Suzette Leith, EPA
John Chesnutt, EPA

**EPA Review of Draft Record of Decision
for Installation Restoration Site 14
Former Firefighter Training Area, Alameda Point**

General Comments:

MNA Comments

1. In several places, the ROD suggests that MNA is part of the selected remedy (e.g., reference to “treatment train” on p. 12-10 and discussion on p. 12-14), and/or suggests that MNA is being selected as a contingent remedy. However, MNA was not considered part of the remedy in the proposed plan or the FS, was not evaluated by the regulatory agencies and by the public as part of the preferred alternative, and should not be included now in the ROD. If, following the ISCO, a decision is made to change the remedy (e.g. to MNA or perhaps another active remedy such as ISB), then a ROD amendment or an ESD will be necessary. Therefore, all references to MNA as part of a treatment train, and all discussions suggesting that MNA is being selected in this ROD as a contingent remedy, should be removed. We also recommend removing Section 12.4 altogether. The parallel section was appropriate for the Site 26 ROD where the selected remedy actually was a treatment train of two active remedies, but that is not the case here.

IC Comments

2. It is not clearly stated that the ICs will remain in place until the concentrations of hazardous substances are at such levels to allow for unrestricted use and exposure, as set forth in the DOD-EPA Federal Facility LUC Checklist item 6. This may be implied in some places (e.g. Sec. 8.0, p. 8-1, last paragraph), but needs to be stated clearly in the description of the selected remedy. Please include this language in Sections 9.3 and 12.3.
3. Use of the phrase “IC termination criteria” at various places in the document is confusing.
 - a. The confusion probably stems from the fact that the IC termination criterion is only defined (as 15 µg/L vinyl chloride in groundwater) in Sec. 8.0, in the context of development and evaluation of the remedies, rather than in the other sections that more clearly describe the actual selected remedy. Please include the actual IC termination criterion in Sections 9.3 and 12.3. (See, e.g., Site 26 ROD p. 12-5.)
 - b. It is confusing to refer to the IC termination “criteria” when, apparently, there is only one criterion. Please clarify this in the ROD.
 - c. On page 9-1, Sec. 9.3, the document states, “Temporary ICs would be placed until groundwater concentration of vinyl chloride achieves the IC termination criteria and

the RAO.” This suggests that the IC termination criteria are something different from the RAO. Please explain.

4. Restrictions in current leases. We have some concern that the lease restrictions in the bullets on p. 12-7 are not as specific as the LUCs bulleted on p. 12-9. For example, it is possible that a lessee could use part of the leased property for a daycare center without needing to get permission to alter the property. In the RD, the Navy will need to provide more details of how the lessees and Navy lease administrators will be informed of the temporary ICs.

ARARs Comments

5. Sec. 13.2.1, p. 13-2, Chemical-Specific ARARs. At the end of the last paragraph on page 13-2, we recommend adding: “(See also Sec. 5.2 and 6.2 regarding groundwater uses.)” This is because those sections include additional information justifying the conclusion that this groundwater is not considered potential drinking water for the purposes of this CERCLA action.
6. Table 13-1, page 13-4, Chemical-specific ARARs. The document states that substantive requirements of Basin Plan chapters 2 and 3 are ARARs, including beneficial uses. Please note that in the ROD for Site 26, the corresponding entry specifically excluded the MUN designation. This should be done here to be consistent with the discussions elsewhere in the document concerning groundwater uses.
7. Table 13-2, Location-specific ARARs.

The Site 26 ROD includes the Migratory Bird Treaty Act as relevant and appropriate because a wildlife refuge is located near Site 26. It may be appropriate to also include this Act for Site14 for the same reasons.

Given that there are endangered species at Alameda Point, we recommend a short discussion in Sec. 13.2.2 (p. 13-6) why ESA is not included as an ARAR.

8. Table 13-3, Action-specific ARARs. The Site 26 ROD includes container-storage requirements. Why are they not included here?
9. Table 13-3, p. 13-15, Action-specific ARARs. In the entry for 22 CCR 67391.1, please add a sentence to the table (or a footnote) that EPA also considers Sections (b) and (d) to be relevant and appropriate.

Specific Comments

1. **Page D-i, fifth paragraph, last sentence:** By signing the ROD, EPA, DTSC and RB will indicate their agreement with the selected remedy, so this sentence is unnecessary and can be deleted.
2. **Page D-ii, second bullet:** Please include the word “maintained” after the word “implemented” as required by EPA HQ checklist item #7.
3. **Page D-iii, first paragraph, last sentence:** Revise sentence to include “The Navy will conduct a 5-year review for this site if the remedy selected in this ROD...”
4. **Page 3-2, Section 3.3, second paragraph, first sentence:** The dates should be March 17, 2006 and March 20, 2006.
5. **Page 4-1, first sentence:** Include the word “further” between no and action since action for soil has already been taken at this site.
6. **Page 4-1, first paragraph, last sentence:** The wording in this sentence seems awkward. Perhaps for clarity it could be rewritten “The Navy has reviewed all written and verbal comments submitted during the public comment period and has determined that no significant changes to the selected groundwater remedial action, and no significant changes to the proposal of no further action for soil, are necessary or appropriate.
7. **Page 4-1, second paragraph, second sentence:** Update to reflect that the Site 15 ROD has already been signed.
8. **Sec. 5.2, p. 5-2, discussion of groundwater:** In the last paragraph on p. 5-2, the statement that “EPA concurred with the development of IC termination criteria for Site 14” is confusing and misleading, as the EPA 2000 letter did not discuss IC termination criteria. Please instead use the language from the last paragraph in sec. 5.2, p. 5-3, in the Site 26 ROD. Please make the same change in Sec. 6.2 on p. 6-1.
9. **Page 5-3, Section 5.3, fourth paragraph:** Arsenic and iron are called out as exceeding residential PRGs, and arsenic is described as being within background concentrations. This begs the question about the iron concentrations.
10. **Table 5-1:** This table contradicts the paragraph referenced in the above comment since the last column in the table states that both arsenic and iron are above background concentrations.
11. **Figure 7-1:** Shouldn't the box for future on-site office worker exposed to volatile emissions/air from groundwater be checked here?

12. **Page 7-7, first paragraph, third sentence:** Change to "...concurrence from the BCT that groundwater is not likely to be a future drinking water source."
13. **Table 7-4:** It is not clear what this table is showing. The concentration of vinyl chloride in groundwater is ten times higher than the highest concentration detected. Please clarify.
14. **Sec. 8.0, p. 8-1.** Discussion of ICs in last paragraph is confusing, as the second sentence suggests that long-term ICs are part of the remedy. It would be preferable to say that the Navy evaluated long-term ICs in developing alternatives.
15. **Section 9.2, page 9.1:** ICs that would be in place for 62 years don't qualify as "temporary".
16. **Sec. 9.3, page 9-2.** This section is somewhat confusing.
 - Is the total remedy expected to take two years plus three years?
 - Are the IC termination criteria something different from the RAO? (See IC General Comment)
 - Final sentence concerning MNA is confusing; see general comment above on MNA. In Sec. 9.3, instead of "MNA could be conducted....", we recommend that the document state, "Monitoring will be conducted..." The same sentence on "MNA could be conducted" is also found on page 12-6, sec. 12.2, and should be removed from that section.
17. **Page 10-2, Section 10.4:** Alternative 1 is no action and therefore doesn't rely on any processes to reduce concentrations in groundwater.
18. **Page 12.0, third paragraph, last sentence, page 12-6, Section 12.2, page 12-10, Section 12.4, second paragraph:** See General Comment on MNA.
19. **Sec. 12.0, Page 12-1, first paragraph after the bullets:** EPA recommends removing the final clause, "this reflects the determination that site-specific releases do not represent a threat to human health or to the environment." As written, this appears to be a qualifier to the conclusion that there is no unacceptable risk, suggesting there may be a risk but that it is not due to site-specific releases. If the conclusion is that there is no unacceptable risk, that should be clearly stated without a qualifier.
20. **Page 12-7, second full paragraph, first sentence:** Change the word "feed" to "deed".
21. **Page 12-10, first paragraph after bullets, first sentence:** Please include the word "maintaining" after the word "implementing" as required by EPA HQ checklist item #7.

22. **Page 12-13:** First bullet at the top mentions “each chemical of concern.” Isn’t there only one chemical of concern that is going to be remediated?
23. **Page 12-14, last paragraph and bullets:** See General Comment on MNA.
24. **Sec. 13.5, p. 13-16.** The text goes to the “permanent solutions and alternative treatment” factor rather than to the “treatment” factor. We recommend using language similar to that in Sec. 13.5 of the Site 26 ROD.
25. **Page 14-1, first sentence:** Add the word “further” between no and action.
26. **Attachment A:** EPA understands that the Navy is currently reviewing the Administrative Record Index for records related to Site 14 and the ROD. Many entries currently included, such as those related to Site 2, can be deleted from this attachment.
27. **Attachment B:** EPA believes Attachment B is unnecessary.
28. **Attachment D, Response to Dale Smith:** It appears that the first sentence in the response would be more accurate if written “... account for differences in the human health and ecological risk assessments.” The third sentence should then state that a HHRA considers the various ways humans etc... The first sentence of the second paragraph should state “The purpose of an ecological risk assessment is to...” The second sentence of the second paragraph doesn’t logically follow. The planned reuse needs to consider the impact of the development on what? And how does the reuse feed into the HHRA and the ecological risk assessment. Also future users don’t have the responsibility to address any impacts on receptors. The ROD is designed so that there won’t be receptors who are impacted. Please revise and clarify this response.

Minor Edits:

1. **Page 1-5, first sentence:** Close brackets at the end of this sentence, i.e. (DTSC 2005 and DTSC 2006).
2. **Table 2-4, Activity 1997 to 1999:** The word “extend” should be “extent”.
3. **Page 7-1, first sentence:** There is a comma missing after the word “during”.
4. **Page 7-3, first sentence:** Delete the “s” from concentration and the “s” from PRG to make them both singular referring to detection frequency.
5. **Page 13-8, fourth paragraph, first sentence:** Delete the word “a” after “injection of”.