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Department of Toxic Substances Control

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ALAMEDA POINT
SSIC NO. 5090.3



Arnold Schwarzenegger
Governor

June 27, 2005

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

DRAFT FINAL FEASIBILITY STUDY REPORT, IR SITE 28, TODD SHIPYARDS, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the responses to comments (RTCs) contained in Appendix D of the document entitled *Draft Final Feasibility Study Report IR Site 28, Todd Shipyards, Alameda Point, Alameda, California* dated May 2005 and finds them to be acceptable provided the following issues are addressed or clarified in future documents:

1. It is the understanding of DTSC that Alameda Point background metals concentrations have never been formally approved by the regulatory agencies. It is also the understanding of DTSC that the background levels were not established using a rigorous scientific method. However, the RTC states that it is "standard practice" at Alameda Point to eliminate metals from further consideration if they exceed the "background range." DTSC would like to request clarification on this issue.

Specifically, we are concerned that such practice allows metals detected at concentrations below the maximum "background" concentration be eliminated. Nickel, for example, is excluded in this study even though it was detected in shoreline wells at concentrations exceeding the California Toxics Rule (CTR).

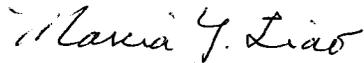
2. We disagree the point of compliance for copper is in the receiving water itself. We further disagree that the existing shoreline wells should be used as the point of measurement for monitoring (see RTC DTSC-OMF #8, page 3). We request that the Navy install guard wells and collect groundwater samples closer to the shoreline to evaluate the levels of copper that may be discharging to Oakland Inner Harbor.

Mr. Thomas L. Macchiarella
Page 2
June 27, 2005

3. For costing purpose, the duration of groundwater monitoring is assumed to be 5 or 10 years depending on the alternatives (Table ES-8). Such duration may fall short of what it really takes. DTSC requests that any future documents (e.g. Proposed Plan/Record of Decision) specifies the end point determination of success (e.g. achieving the remedial action objectives (RAOs)) and discusses contingencies for failure.
4. It has been verified that storm drains with outfalls into Oakland Inner Harbor intersect arsenic contaminated groundwater at IR Site 28. DTSC request the potential impact of arsenic on sediment at the storm drain outfalls (particularly City Outfall East) be evaluated.

Please contact me at 510-540-3767 or mliao@dtsc.ca.gov if you have any questions.

Sincerely,



Marcia Liao
Remedial Project Manager
Office of Military Facilities

cc: Greg Lorton, SWDiv
Jennifer Stewart, SWDiv,
Anna-Marie Cook, EPA
Judy Huang, RWQCB
Elizabeth Johnson, City of Alameda
Peter Russel, Northgate Environmental
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