



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
Environmental Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.waterboards.ca.gov/sanfranciscobay>

N00236.002617
ALAMEDA POINT
SSIC NO. 5090.3

Arnold Schwarzenegger
Governor

Date: **NOV 07 2006**
File: 2199.9285(EWS)

Department of the Navy
Base Realignment and Closure Program Management Office West
ATTN: Thomas L. Macchiarella
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Subject: Comments on the Draft Action Memorandum for the CERCLA Time-Critical Removal Action at IR Sites 1, 2, and 32, Alameda Point, Alameda

Dear Mr. Macchiarella:

Upon review of the *Draft Action Memorandum for the CERCLA Time-Critical Removal Action at IR Sites 1, 2, and 32, Alameda Point, Alameda* dated 10/11/06 (Draft Action Memo) we have the following comments:

#	Page	Section	Comments
G1		General	Please clearly discuss whether this TCRA will include the removal of the shooting range berm located at IR Site 1.
S1	1-1	1.0	Purpose – Last Paragraph - This paragraph specifies that that the proposed removal action will remove material exhibiting radiation contamination at IR Site 1, but does not specify that contaminated areas will be removed from Sites 2 or 32. Please clearly indicate in this paragraph that Sites 2 and 32 will also be addressed based on the results of the radiological survey being conducted. This applies to other section of the Draft Action Memo as well (including Section 4.1.1).
S2	1-1	1.0	Purpose – Last Paragraph – This paragraph also mentions that areas would be removed that would result in a greater than 15 millirem per year (mrem/yr) committed effective dose exposure (CEDE) to any member of the public. Please also indicate the land use, beneficial use, exposure pathway, length of exposure, and other pertinent information that was considered in making this determination, or include a reference to where this information is located in the document.

#	Page	Section	Comments
S3	2-1	2.1	Site Background – IR Site 2 – This section indicates that a disposal area exists to the east of IR Site 2, which is an area that is not an established IR area. This Draft Action Memo does not discuss whether or not radiological contamination may exist to the east of Site 2. Please include a discussion somewhere in this document discussing the previous radiological data collected in the disposal area east of IR Site 2, and provide justification for not including this area in the TRCA, if applicable.
S4	2-4	2.1.3	Removal Site Evaluation – Please indicate whether any radiological groundwater sampling has occurred at these sites and include a discussion of the environmental fate characteristics of radium impacted waste at these sites. Also include a discussion of any groundwater data below these sites and sediment sampling data offshore of these sites that may indicate whether radiological contamination is mobile in the subsurface environment or migrating to the San Francisco Bay.
S5	4-2	4.1.1	Proposed Action Description – First Paragraph - The proposed removal actions mentioned in this paragraph includes removal of detected MPPEH at Site 1, but does not discuss the complete removal of the shooting range berm. Please include a discussion regarding the removal of the shooting range berm located in IR Site 1.
S6	4-2	4.1.1	Proposed Action Description – Indicate if radium contamination in groundwater has been investigated or identified at these sites, and if final remediation will be addressed through the CERCLA process.
S7	4-3	4.1.3.2	Selected Removal Action Alternative – Indicate that this removal action will have potential stormwater runoff impacts and a Stormwater Pollution Prevention Plan is needed. This will ensure that best management practices are incorporated into the removal action to reduce stormwater runoff contamination. Some of this information is presented later in Section 4.1.4.2., which discusses Action-Specific ARARs, but would be appropriate to include when discussing the selected removal action alternative.

S8	4-5	4.1.3.3	Cost – Section 4.1.3.3 discusses the evaluation of removal and on-site disposal action alternative. The cost section currently reads: ‘Unit Costs for labor, mobilization, and site remediation are, on average, greater than the unit cost of chemical contamination in soils. The cost may become prohibitive when disposing of the hazardous contaminants on site.’ Please rephrase this paragraph to make it meaning more clear to the reader. What does the ‘unit cost of chemical contamination in soils’ mean? Why is cost prohibitive when disposing on-site?
S9		App. B	Pages 2,4, and 6 – Please rotate these pages 180 degrees so that they are easier to read.

Please contact me at (510) 622-2355 or email ersimon@waterboards.ca.gov if you have any questions.

Sincerely,



Erich Simon
Project Manager

CC (via US Mail):

Mark Ripperda
U.S. EPA Region IX
75 Hawthorne Street, (SFD-8-2)
San Francisco, CA 94105-3901

Anna-Marie Cook
U.S. EPA Region IX
75 Hawthorne Street, (SFD-8-2)
San Francisco, CA 94105-3901

Ms. Dot Lofstrom
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

Frances Fadullon
Department of the Navy
BRAC PMO West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Andrew Baughman
Department of the Navy
BRAC PMO West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Mr. Peter Russell
Russell Resources
440 Nova Albion Way, Suite 1
San Rafael, CA 94903-3634