



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
Environmental Protection

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ALAMEDA POINT
SSIC NO. 5090.3

Arnold Schwarzenegger
Governor

Date: DEC 12 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 Final Record of Decision for IR Site 14, Former Firefighter Training Area, Alameda Point, Alameda

Dear Mr. Macchiarella:

Upon review of the *Draft Final Record of Decision for Installation Restoration Site 14, Former Firefighter Training Area, Alameda Point, Alameda, California*, dated November 21, 2006 (Draft Final ROD) we have the following comments:

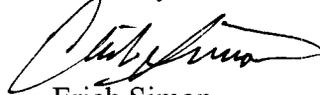
#	Page	Section	Comments
G1	General		Please be consistent when referring to our agency. While we have been referred to in the past as the Regional Water Quality Control Board or RWQCB, we are now known as the San Francisco Bay Water Board, or just Water Board.
S1	2-6 to 2-8	2.2.1	Brief descriptions of previous investigations at the site are given, including what types of samples were taken, and what constituents were analyzed for, but no discussion of important findings or results is given. Please include a brief summary of important findings for each of these previous investigations.
S2	5-3	5.3	Nature and Extent of Contamination in Soil and Groundwater – Third Paragraph – Not enough justification is given to support no further action recommendation for soil. This paragraph details some of the current contamination in soil above PRGs, including 1 VOC and 4 SVOCs (all PAH related), but doesn't go into any detail regarding the concentrations or extent of these contaminants at the site. How do the PAH concentrations compare with the 620 ug/kg B(a)P equivalent concentration screening level?
S3	Table 5-1		Chemicals in soil Exceeding Residential PRGs - Please explain the difference between 'Detection Range' and 'Range of Detected Concentrations'. Also, please include # of samples and PRG levels in this table for reference.

#	Page	Section	Comments
S4	5-6	5.3	<p>Nature and Extent of Contamination in Soil and Groundwater – top paragraph – The discussion mentions that the high levels of manganese observed in the groundwater at the site are likely the result of seawater intrusion, but the monitoring well cited with the highest levels of manganese is located in the southern portion of Site 14, away from the Oakland Inner Harbor. Do you mean to suggest that the entire FWBZ underlying site 14 is impacted by seawater intrusion? Have there been studies to determine tidal influence at the site?</p>
S5	5-6	5.3	<p>Nature and Extent of Contamination in Soil and Groundwater – third paragraph – This paragraph mentions that the residential PRGs for some pesticides are below laboratory detection limits. Please specify which pesticides (and other constituents for that matter) have detection limits above residential PRGs and discuss how that may have impacted site characterization and risk assessment.</p>
S6	6-1	6.2	<p>Groundwater Uses – When describing exemption of the drinking water beneficial use at Alameda Point, please include reference to State Board Resolution 88-63, and clearly specify which areas are exempt. The first sentence states that the groundwater beneath the central portions of Alameda Point meets exemption criteria. This sentence is misleading, and should be revised to state that the Water Board agrees that the groundwater west of Saratoga Street meets the exemption criteria, as indicated in the Water Board letter dated 7/21/03.</p>
S7	Table 7-2 and 7-3		<p>Summary of Site 14 Soil and Groundwater Risk Tables – Please clearly indicate whether risks presented in these tables refers to total risk and the site, or incremental risk above background risk. If they refer to the later, please also include the total risk for comparison.</p>
S8	7-9	7.2	<p>Approach to Screening-Level Ecological Risk Assessment - fourth paragraph – Direct exposure to soil and food chain exposure are identified as the complete exposure pathways considered for terrestrial receptors. Please include justification for why direct contact and inhalation were not considered.</p>

#	Page	Section	Comments
S9	8-1	8.0	Remedial Action Objectives – There needs to be more justification for why the RAOs focus only on vinyl chloride. What about the other related breakdown products associated with vinyl chloride? Also, as this site is next to the Oakland Inner Harbor and sea water intrusion has previously been documented (see comment S4 above), please ensure that groundwater contaminant levels are compared with CTR criteria whenever appropriate. If CTR criteria are not considered for specific constituents, such as Vinyl Chloride, please include justification.
S10	12-11	12.4	Expected Outcomes of the Selected Remedy - The selected remedy considers the groundwater-to-air migration pathway, but does not include consideration of freshwater replenishment. Please include consideration of this beneficial use when discussing remedial action objectives.

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 and email):

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