



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

Edwin F. Lowry, Director
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721

N00236.002717
ALAMEDA POINT
SSIC NO. 5090.3



Arnold
Schwarzenegger
Governor

June 3, 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 OFFSHORE SEDIMENT CORE STUDY WORKPLAN AT OAKLAND INNER HARBOR, PIER AREA, TODD SHIPYARD, AND WESTERN BAYSIDE, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed Navy's Response to Comments (RTC) on the draft work plan, specifically, Appendix E of the above referenced document dated April 29, 2005 which was received on May 2, 2005. Our comments along with the comments from the Department of Fish and Game (DFG) are attached.

Please note that DTSC withholds our concurrence on the data gap determination at this time pending clarification on the usability of historical sampling data. Please make sure this usability issue is adequately addressed in the Remedial Investigation (RI) report.

In addition, it is our opinion that sediment contamination usually originate from on-shore sources. Since the on-shore and offshore studies at Alameda Point have been carried out by different contractors during different time periods, there have been some disconnect between these studies. Please ensure that the RI report will make the necessary connection and present a comprehensive examination of the impact of historical naval activities on the offshore areas including the rip-rap, beaches and areas submerged under water.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.dtsc.ca.gov.

Mr. Thomas Macchiarella
Page 2
June 3, 2004

Please review the attached comments and address them accordingly in the RI report. Should you have any questions, please contact me at 510-540-3767 or mliao@dtsc.ca.gov.

Sincerely,



Marcia Liao
Remedial Project Manager
Office of Military Facilities

Enclosure

cc:

Greg Lorton, SWDiv
Darren Newton, SWDiv
Mark Ripperda, EPA
Judy Huang, RWQCB
Robert Wilson, DHS
Charlie Huang, DFG
Elizabeth Johnson, City of Alameda
Peter Russell, Russell Resources
Jean Sweeney, RAB Co-Chair
Lea Loizos, Arc Ecology

DTSC COMMENTS
DRAFT FINAL OFFSHORE SEDIMENT CORE STUDY WORKPLAN
OAKLAND INNER HARBOR, TODD SHIPWARD, PIER AREA, AND
WESTERN BAYSIDE
ALAMEDA POINT, CALIFORNIA

PART I: COMMENTS FROM THE OFFICE OF MILITARY FACILITIES (OMF)

1. RTC #1 Basis for Data Gap Identification

Appendix C is an inventory of historical sampling stations and analytical parameters. It does not contain any historical sampling data.

DTSC withholds our concurrence on the data gap determination at this time. In addition, we request the following be provided in the remedial investigation (RI) report when historical data are used to fill the data gaps:

- Agency review and concurrence status of historical sampling data
- Discussion of usability (e.g. detection limit) of historical data
- Graphical presentation of historical data

2. RTC #4 Non-Point Surface Run-Off

Please include discussion of surface run-off and its potential impact on offshore sediments in the RI report.

3. RTC#6 Other Potential On-Shore Sources

For future reference, please indicate relevant page numbers in the RTC to allow quick review of the revisions.

Please include in the RI report sufficient discussions of potential on-shore sources including, but not limited to, the release of creosote from wood pilings at the Pier Area, historical open burning at the northwestern tip of IR Site1, and potential residual lead shots and clay targets at the shoreline/beach area at IR Site 1.

It is our opinion that contamination at the offshore sediment originated from on-shore historical naval activities. Since the on-shore and offshore studies are carried out by different contractors during different time periods, there have been some disconnect between these studies. Please make sure that the RI report sufficiently integrates findings from pertinent on-shore studies and presents a comprehensive understanding of the impact of on-shore sources.

4. RTC # 9 Data Quality/Data Usability

The DTSC reviewer is unaware of the comprehensive evaluation of all historical data indicated in the RTC.

Please provide sufficient discussion on data usability of historical data in the RI report (see Comment #1 re: RTC #1).

5. RTC#11 Data Quality/Data Usability

Please provide specifics in the RI report to substantiate the statement that strong correlations between the field lab and screening data have been established.

6. RTC #19 Lateral Extent of Contamination

Please make sure the RI report presents the historical coarser grained data near shore zone and provides as wide as possible a coverage of the offshore area.

7. RTC # 21 Western Bayside

Given that the future land use at these areas include trails, parks and wildlife refuges, DTSC will seek a full understanding of the potential exposure to human in and around the rip-rap, the beach area, and the areas submerged under water by making sure that various onshore and off-shore studies are integrated. We appreciate the additional sampling efforts from the Navy and look forward to reviewing the data.

Please include collaborating evidence in the RI report to substantiate the statement that the burn area was actually located slightly south of the northwestern corner of Western Bayside and it is likely that historical samples (WB0001) have characterized the affected shore area.

8. RTC #22 Pier Area

In the RI report, please discuss if the north side of Pier 1 has been subject to dredging. If not, pending on the sampling results south of Pier 1, it may be necessary to investigate the sediment at the north side of Pier 1 and have it remediated, if necessary.

9. RTC #23 COPCs

DTSC considers the evaluation of data quality/data usability for all historical data an important element in data gap identification including the selection of appropriate analytical parameters. A mere reference of

previous investigations without providing specifics, such as agency concurrence on the previous studies, is not considered an adequate response.

Please make sure that the RI report provides sufficient details to support the assertion that volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs) and total petroleum hydrocarbons (TPHs) are not considered chemicals of concerns (COCs).

PART II: COMMENTS FROM THE HUMAN AND ECOLOGICAL RISK DIVISION (HERD)

Please see the attached HERD memorandum, dated June 2, 2005, prepared by Dr. Jim Polisini.



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

1011 North Grandview Avenue
Glendale, California 91201



Arnold Schwarzenegger
Governor

MEMORANDUM

TO: Marcia Liao, DTSC Project Manager
OMF Berkeley Office
700 Heinz Street, Second Floor
Berkeley, CA 94704

FROM: James M. Polisini, Ph.D.
Staff Toxicologist, HERD
1011 North Grandview Avenue
Glendale, CA 91201

DATE: June 2, 2005

SUBJECT: NAVAL AIR STATION ALAMEDA (ALAMEDA POINT) DRAFT
FINAL OFFSHORE DATA GAPS WORK PLAN
[SITE 201209-18 PCA 18040 H:12]

BACKGROUND

HERD reviewed the document titled *Draft Final Offshore Sediment Study Work Plan at Oakland Inner Harbor, Pier Area, Todd Shipyard, and Western Bayside, Alameda Point, California* dated April 29, 2005. This document was prepared by Batelle of Duxbury, Massachusetts, Blasland, Bouck and Lee, Inc. of Carpinteria, California and Neptune and Company of Los Alamos, New Mexico. HERD reviewed the draft offshore work plan in a HERD memorandum dated December 1, 2004. The review of this draft final work plan (WP) is in response to your request transmitted via electronic mail on May 11, 2005.

This WP proposes collection of sediment at 46 stations in support of the ecological and human health evaluation of the Oakland Inner Harbor (OIH) and Todd Shipyard (TS) along the northern boundary of Naval Air Station (NAS) Alameda, the Western Bayside (WBS) along the western San Francisco Bay boundary and the Pier Area (PA) along the eastern shore inside the breakwater to the south of NAS Alameda.

NAS Alameda was an active naval facility from 1940 to 1997. Operations included aircraft, engine, gun and avionics maintenance; fueling activities; and metal plating, stripping and painting. Linked storm water and industrial wastewater lines discharged to

Marcia Liao

Page 2

the Seaplane Lagoon in the Northwest and Northeast corners, as well as the Oakland Inner Harbor Channel side of NAS Alameda.

GENERAL COMMENTS

HERD focused on the Navy Response to Comments (RTC) contained in Appendix E and the text sections, figures or tables associated with the previous HERD comments contained in a memorandum dated December 1, 2004. Previous HERD comments not specifically addressed here were adequately addressed by the Navy RTC.

SPECIFIC COMMENTS

1. HERD General Comment number 2: The specific citation for the proposed soil 'ambient' concentrations is appreciated. However, HERD has yet to perform independent review of the proposed 'ambient' soil data set. Please provide an Excel-readable copy of the proposed 'ambient' data set for inorganic elements.
2. HERD Specific Comment number 1: The specific document indicating an undredged shelf much less than 246 feet at Outfall 1 for the Alameda Annex is titled *Ecological Assessment of the Sediment at Outfall 1, Fleet and Industrial Supply Center, Oakland Alameda Facility/Alameda Annex Site, Alameda, California*. The draft final version of this document is dated April 30, 1998 and was prepared by Tetra Tech EM Inc., of Rancho Cordova, California. HERD review of this document is contained in a HERD memorandum dated June 12, 1998. HERD offers this information only to indicate that, at least in some areas of the OIH, the undredged shelf is less than 246 feet. No response is required from the Navy or Navy contractors.
3. HERD Specific Comment number 5: The Office of Environmental Health Hazard Assessment (OEHHA) has been added as a source of toxicity values for the Human Health Risk Assessment (HHRA) as directed. However, OHHEA is not a part of DTSC but is an Office in the California EPA. Both the citation and the complete reference of DTSC(2003) (Section 3.1.1, page 19) should be amended to CalEPA(2003) or OEHHA(2003).
4. HERD Specific Comment number 12: There is one issue not affirmatively stated in the response regarding the evaluation of fish. The National Oceanic and Atmospheric Administration (NOAA) sediment concentration for polycyclic aromatic hydrocarbons (PAHs) adverse effects on fish populations (i.e., 1000 µg/kg PAHs) must be included in the evaluation of potential adverse effects on fish for the offshore areas of NAS Alameda where PAHs are a Contaminant of Potential Ecological Concern (COPEC). No response is required for this comment, except the inclusion of the NOAA value in the risk characterization for PAHs.

Marcia Liao

Page 3

5. HERD Specific Comment number 22 and 26: Limiting the investigation of the debris pile to material above Mean Seal Level (MSL) limits the characterization of the debris pile in Seaplane Lagoon (SPL) and leaves a data gap which may require future investigation. This comment is intended for the DTSC Project Manager and no response is required from the Navy or Navy contractors.

CONCLUSIONS

Any potential impact of the comments listed above concern the risk characterization and potential data gaps and should not impede the process of mobilization and collection of samples for the work outlined for the offshore areas of NAS Alameda.

HERD has yet to receive a copy of the proposed 'ambient' soil data set in an Excel-compatible format which will allow independent review of the proposed 'ambient' soil concentrations for inorganic elements. This request has been made numerous times.

HERD Internal Review: Michael Anderson, Ph.D.
Staff Toxicologist

cc: Ned Black, Ph.D., BTAG Member
U.S. EPA Region IX (SFD-8-B)
75 Hawthorne Street
San Francisco, CA 94105

Ms. Beckye Stanton
California Department of Fish and Game
1700 K Street, Room 250
Sacramento, CA 94244-2090

Charlie Huang, Ph.D., BTAG Member
California Department of Fish and Game
1700 K Street, Room 250
Sacramento, CA 94244-2090

Laurie Sullivan, M.S., BTAG Member
National Oceanic and Atmospheric Administration
c/o U. S. EPA Region 9 (H-1-2)
75 Hawthorne Street
San Francisco, CA 94105-3901

Marcia Liao

Page 4

Naomi Feger
Judy Huang
San Francisco Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Voice 818-551-2853
Facsimile 818-551-2841
C:\Risk\NASA\Offshore Data Gaps Draft Final Work Plan.doc/h:12

State of California

Memorandum



To: Marcia Liao
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Date: June 2, 2005

From: Charlie Huang, Ph.D. Staff Toxicologist
California Department of Fish and Game
Office of Spill Prevention and Response
Scientific Division
1700 K Street, Suite 250
Sacramento, CA 95814

A handwritten signature in black ink, appearing to read "Charlie Huang", is written over the "From:" field.

Subject: **Comments on Draft Final Offshore Sediment Study Work Plan at Oakland Inner Harbor, Pier Area, Todd Shipyard, and Western Bayside, Alameda Point, California, dated April 29, 2005.**

As trustee for the State's natural resources, the California Department of Fish and Game (DFG), Office of Spill Prevention and Response (OSPR) has completed its review of the "**Draft Final Offshore Sediment Study Work Plan at Oakland Inner Harbor, Pier Area, Todd Shipyard, and Western Bayside, Alameda Point, California,**" dated April 29, 2005. This Study Work Plan (SWP) was prepared for the Navy by Battelle, BBL Inc., and Neptune & Company. Per the Federal Facilities Agreement, we reviewed the document. The comments that follow are provided as part of our role as a natural resource trustee for the State of California's fish and wildlife and their habitats.

We received the document on May 2, 2005. This review includes DFG-OSPR comments related only to ecological risk assessment and biological resources. We did not review the SWP's human toxicological, geological, hydrological, and engineering sections. We also did not review the SAW for formatting, grammar and other minor editorial comments.

Background

Alameda Point was formerly called Naval Air Station (NAS) Alameda. It is on Alameda Island, at the western end of the City of Alameda in Alameda County, and along the eastern side of San Francisco Bay.

Similar to the shoreline of Oakland Inner Harbor, Alameda Point is almost entirely modified by human activity. Industries and activities located at the facility include port facilities, aircraft repair facilities, office buildings, runways, and landfills. In addition, Alameda Point includes contiguous and noncontiguous properties such as constructed breakwaters. Major habitat types include open water areas; estuarine intertidal emergent wetlands; non-native grassland; ruderal upland vegetation; disturbed areas; beach, urban, and ornamental landscapes; and riprap. Several special status species that occur or are expected to occur have been identified at Alameda Point.

Marcia Liao
June 2, 2005
Page 2 of 3

Oakland Inner Harbor is defined as the 2,760-square-meter portion of the Oakland Estuary adjacent to the northern boundary of Alameda Point. The Oakland Inner Harbor Channel is a major industrial waterway serving marine terminals and repair facilities in the cities of Oakland and Alameda. Oakland Inner Harbor (IR Site 20) and Todd Shipyard (IR Site 28) are located on the southern side of the Oakland Inner Harbor Channel, adjacent to the northern shoreline of Alameda Point.

Western Bayside is located along the western and southern edge of Alameda Point. Although it was not identified as an IR site, Western Bayside is adjacent to the majority of land associated with the 1943-1956 Disposal Area (IR Site 1) and the West Beach Landfill (IR Site 2), active from 1957 to 1978. Pier Area (IR Site 24) is located along the southern edge of Alameda Point.

Comments

1. DFG-OSPR appreciates this opportunity to provide guidance on the planned cleanup at the Alameda Point. This memo will serve to inform the Navy of our continuing interest in coordinating any natural resource issues, as one of the designated State natural resource trustees. This may be necessary should release(s) of any hazardous materials at the subject site affect State natural resources.
2. This review focused on whether Dr. Beckye Stanton's comments in a previous letter from the U.S. Fish and Wildlife Service (Service) were adequately addressed. The responses to comments in the Attachment accurately reflected the written comments from the Service. The responses to comments show a good faith effort by the Navy to provide a more detailed site-specific evaluation of ecological risk.
3. We have reviewed the comments prepared by US Environmental Protection Agency (USEPA), California Department of Toxic Substances Control (DTSC), and California Regional Water Quality Control Board, San Francisco Region (RWQCB-SF) for the Draft SWP. We generally concur with the concerns expressed by USEPA, DTSC, and RWQCB-SF regarding depth intervals, additional sampling locations at Western Bayside, background reference locations off Site 24, exposure parameters for avian species, and hazard indices of chemicals with similar action.

Conclusions:

Since Dr. Beckye Stanton's comments have been appropriately addressed, we have no further comments for the Draft Final SWP. Overall, the responses to comments and the corresponding changes made in the SWP are acceptable. This SWP has sufficient detail for acceptance by DFG at this time. We look forward to continued further interactions with Navy staff on issues related at Oakland Inner Harbor, Pier Area, Todd Shipyard, and Western Bayside.

DFG-OSPR appreciates the opportunity to review this document. If you have any questions regarding this memo or require further details, please contact me at (916) 324-9805 or by e-mail at chuang@ospr.dfg.ca.gov.

Marcia Liao
June 2, 2005
Page 3 of 3

Reviewer: Julie Yamamoto, Ph.D.
Senior Toxicologist

Enclosure

cc: Dan Welsh, Ph.D.
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W2605
Sacramento, California 95825

James Polisini, Ph.D.
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

Ned Black, Ph.D.
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Judy Huang
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612

Laurie Sullivan
NOAA Coastal Resources Coordinator
U.S. EPA Region 9 (SF-D-8-1)
75 Hawthorne Street
San Francisco, California 94105

Department of Fish and Game
Office of Spill Prevention and Response
Julie Yamamoto, Ph.D.

Response to Comments
 April 2005 Draft Final Offshore Work Plan
 Alameda Point, California

General Comments (Comments)		
1	Site data was frequently referred to as comparable to ambient or reference conditions without any supportive data provided. Please present the statistical analysis that compares the two populations. In addition, please state the concentration (e.g. ER-M for total PCBs at 0.18 mg/kg) when referring to specific ambient or effects-range median (ER-M) values	Comparisons to ambient and reference conditions are clearly documented in previous reports. Citations for these investigations are provided where appropriate in the Work Plan text.
2	The use of only surface (top 5 cm) sediment data does not address the exposure of organisms to deeper sediments, both for benthic invertebrates that utilize deeper sediments and organisms exposed indirectly to deeper sediment through the bioturbation activities of several benthic invertebrate species.	Please see response to EPA General Comment #1. In summary, while surface sediments will be used to evaluate current ecological and human health risks, ecological risks associated with sediments in the 5 cm to 25 cm interval will also be evaluated.
Specific Comments (Comments)		
1	Page 11. Please revise the phrases "this storm sewer system" as having "no significant discharges [that] were related to industrial sources" to clarify whether it refers to all three lines. Furthermore, this statement appears contradictory to the service of buildings and areas that stored chemical hazardous waste including solvents, acids, alkalis, heavy metals, resins, diesel, and oil.	The text has been modified.
2	Page 12. Please identify in which locations the dredge material from the Pier area was disposed of.	This information is not provided in available sources.
3	Page 12. Based on information provided on page 13 that site concentrations of total polychlorinated biphenyl (PCBs) exceeded ER-M levels (0.18 mg/kg), PCBs should be added to the list of organic constituents exceeding San Francisco sediment ambient levels (0.015-0.022 mg/kg, depending on congeners included).	In the Pier Area Remedial Investigation, it will be noted that concentrations of PCBs exceed ambient levels.
4	Page 13. Please state where the reference sites were located.	The location of the reference sites is clearly documented in the previous investigations cited in the Work Plan.

5	Page 14. Please revise the statement regarding primary ecological habitat locations because deeper water habitats also provide habitat for species, including fish and invertebrates. In addition, please provide a current bathymetry map of the area.	The text has been revised. Inclusion of bathymetric maps will be considered as part of the Remedial Investigation.
6	Pages 15, 24, 27, 28. Ecological receptors can be exposed to sediments deeper than the surficial 5 centimeters. Therefore, the Service recommends that data from deeper sediments also be used to evaluate potential ecological risk and that, at a minimum, at least one other discrete sample be taken at one foot depth.	Please see response to EPA General Comment #1. In summary, while surface sediments will be used to evaluate current ecological and human health risks, ecological risks associated with sediments in the 5 cm to 25 cm interval will also be evaluated. In addition, as discussed with the Agencies on March 28 2005 (minutes attached at end of RTCs) and in response to Water Quality Control Board Specific Comment #5, the Work Plan has been revised to indicate that four sampling intervals will be collected: 1) top 5 cm; 2) 5 cm to 25 cm; 3) 25 cm to 50 cm and 4) greater than 50 cm. The first three intervals will be evaluated as described in the work plan for all cores collected; the fourth will be archived for all cores with the exception of WBC-16 and WBC-17.
7	Page 15. Please revise the statement regarding test pits to note that it refers to the investigation of the construction debris pile specifically.	This paragraph has been revised.
8	Page 23. Please include information regarding tern and pelican use in other offshore areas, particularly the pelican roost site.	This information will be provided in the subsequent risk assessments.
9	Pages 23, 24. Please provide additional evidence that supports the assumption the marine mammals would not be exposed to the sediments offshore of Alameda, particularly given the presence of a harbor seal haul-out area at Yerba Buena Island.	A more detailed discussion of the movements of harbor seals in San Francisco Bay will be provided in the ERA. In addition, potential exposures to marine mammals will be discussed qualitatively in the SLERA.
10	Page 24. Please note that benthic invertebrates can also be exposed via sediment porewater and suspended sediment particles.	The work plan was revised to indicate that porewater may also be a potentially important exposure pathway.

11	Page 24. Please include assessment endpoints at the level of populations or individuals of species, not communities of multiple species.	Preliminary assessment endpoints presented in the work plan represent the generic conceptual site model for all of the areas evaluated. These endpoints may be revised as necessary during the development of the ERAs for each offshore area.
12	Page 26. Please detail how the potential confounding factors will be addressed when using the historical bioassay data in the risk assessments.	The work plan has been revised to more fully describe the use of the historical data in the ERAs.
13	Page 27. Please include indirect exposure through the food chain for fish species as well.	There is currently no accepted methodology for conducting dose evaluations (i.e., indirect food chain exposures) for fish species.
14	Page 27. Please revise the phrase "indications of a possibility of risk that may require verification" to "indications of a possibility of risk that require further evaluation."	The final sentence in the paragraph indicated states that receptors and COPECs identified in the SLERA as posing the potential for risk will be evaluated more fully in the BERA.
15	Page 27. Effects range-low (ER-L) values represent sediment concentrations associated with adverse effects to invertebrates, particularly amphipod mortality, and do not apply to direct fish toxicity.	In the absence of an accepted methodology for conducting dose evaluations for fish species, the ER-Ls were determined to be the best method for investigating potential effects on all aquatic species, including fish.
16	Page 29. The Service recommends use of hazard indices to account for cumulative risk between similarly acting chemicals.	The work plan has been revised to indicate that potential cumulative risks will be evaluated.
17	Page 30. Please describe what ambient datasets will be used.	The work plan has been revised as requested.
18	Page 31. The least tern was missing from the list of receptors.	The least tern was identified as a receptor of concern based on its special status species and will be evaluated in the site-specific ERAs.
19	Page 31. Please use either field-collected forage fish data or modeled forage fish concentrations based on the site-specific bioaccumulation factors to estimate dietary exposure to piscivorous birds, rather than using short-term laboratory data for clams.	Section 3.1.2.2 describes the methodology that will be used to model forage fish tissue concentrations.
20	Page 31. Please note that seasonal migration is appropriately excluded because the risk assessment is based on per day units for both exposure and toxicity.	A full discussion of the uncertainty associated with the site use factor will be provided in the ERA.

Response to Comments
 April 2005 Draft Final Offshore Work Plan
 Alameda Point, California

21	Page 45. Additional data collected from the Western Bayside area is necessary to characterize fully contamination and potential risk, not just to "confirm the ... recommendation of No Further Action." Please revise or remove this statement.	Section 2 of the work plan was revised to more clearly describe the data gaps identified as part of the data gaps memorandum.
22	Page 46. As mentioned on the earlier conference call, the Service believes the currently proposed "reference" location that is directly outside the lagoon and near where a sample is being collected as part of the Western Bayside area effort (WBC-1) may not be representative of reference conditions. The Service recommends the more than one sample location would be needed to define reference conditions and make statistical comparisons, and that such samples be collected from further offshore or at deeper depths where the potential contamination from other Alameda sites is not likely.	As discussed in the response to EPA Comment #16, the reference location has been moved to an area south of Pier 3, approximately 100 feet north of the Breakwater.
23	Page 48. Please show on Figure 3-6 the locations of previous Seaplane Lagoon samples on the northern side of the pier area.	Data collected from within Seaplane Lagoon is being addressed in the RI/FS process for IR Site 17 and was, therefore, not considered relevant for this discussion.
24	Page 48. The surface sediment in the area to the southeast of the piers was sampled previously, but no sediment cores are proposed to address the lack of deeper sediment data. Please include several sediment cores in this area.	One sediment core, PAC-19, has been proposed for this area (see Figure 3-6).
25	Pages 50, 51. Please include the following chemicals in the proposed sediment analysis: barium, beryllium, boron, cobalt, manganese, vanadium, heptachlor epoxide, and total petroleum hydrocarbons in the diesel, gasoline, and motor oil ranges.	The COPC lists presented are based on evaluation of historical data.
26	Page 50. Please describe what analyses are proposed for the wood shavings.	The wood scrapings will be evaluated for a full suite of PAH compounds.
27	Page 51. The pile is described as being six feet above the water surface so presumably the debris continues down to the adjacent water depth (generally 0 to 5 feet mean low low water (MLLW) based on the Seaplane Lagoon bathymetry map). However, the only sampling proposed are test pits to 6 foot depth (i.e., to the water surface). Please describe how contamination below the adjacent water surface will be investigated.	Sediment cores from the offshore areas adjacent to the debris pile have been collected and evaluated as part of the RI/FS process for IR Site 17.

TOTAL P.07