



California Regional Water Quality Control Board

San Francisco Bay Region



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Arnold Schwarzenegger
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ALAMEDA POINT
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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 Workplan for Data Gap Sampling Investigation,
Installation Restoration Site 28, Alameda Point, Alameda**

Dear Mr. Macchiarella:

Upon review of the above mentioned document, dated January 2007, we have the following comments:

General Comments

1. The data gap sampling effort should be expanded to include a tidal influence study or assessment of potential sea water intrusion at the shoreline wells. The need for this effort is acknowledged in the *Final Technical Memorandum to Supplement the Administrative Record for Installation Restoration Site 28, Todd Shipyards* (January, 2007). As stated in this memo, "Further characterization of the site to determine the extent of the tidal mixing zone is needed before conclusions can be drawn with respect to seawater intrusion or dilution of groundwater as a result of mixing with seawater." Similar studies have also been conducted by the Navy at Treasure Island and Mare Island¹.

We do not consider dilution an appropriate means of contaminant remediation or attenuation. With that in mind, we consider the point of exposure (POE) to be the point nearest the shoreline that is not tidally influenced or mixed with surface water. If dilution is indeed occurring at the shoreline wells at Site 28 due to sea water intrusion, they will not accurately represent potential groundwater concentrations and should not be used as points of measurement (POMs). Therefore, we request the data gap investigation be expanded also include an evaluation of tidal influence and sea water intrusion at the shoreline wells at Site 28. Without an understanding of the nature and extent of the contamination identified near the shoreline of Site 28, an effective remedial design that is protective of all beneficial uses can not be formulated.

If tidal influence in the shoreline wells is demonstrated, monitoring well data would be considered points of exposure and subject to comparison with CTR criteria. Furthermore,

¹ References available upon request.

groundwater modeling as proposed in the tech memo would require identification of appropriate points of measurement not influenced by sea water.

2. Please include a discussion of any pertinent metals data (sediment and pore water) from IR site 20, directly offshore from IR Site 28 to the north, which may indicate if metals contamination associated with Site 28 may also be present in the offshore sediment.

Specific Comments

1. Section 4.3, Pg 15 – After the new groundwater monitoring well will be installed, one groundwater sample is proposed to be collected. Please explain how tidal or seasonal variations in groundwater will be considered at this monitoring location.
2. Table A-2 – This table specifies that no soil screening levels for metals are applicable to this project except for copper. As remedial action objectives have been established for arsenic and lead, please include these screening levels as well.

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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