

**Response to Comments Presented in the Conditional Concurrence on the Fuel Line Corrective Action Area A (CAA-A), No Further Action (NFA) Report and Request for NFA, Alameda Point, Alameda (Dated January 7, 2004)
 Comments Issued by Mr. Erich Simon of the San Francisco Water Board on March 13, 2007**

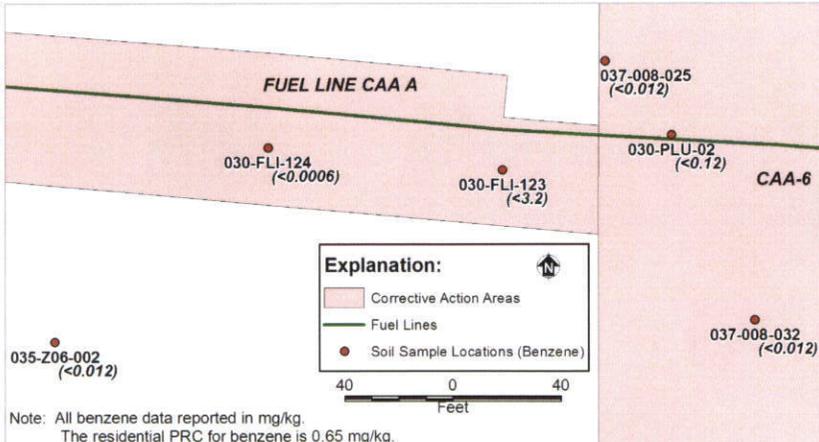
Comment Number	Comment	Response
<i>Groundwater Comments</i>		
1.	<p>While groundwater samples 030-FLI-521 and 030-FLI-523 taken near storm drains exhibited TTPH levels slightly above PRCs for marine ecological receptors exposed through the storm drain pathway, we concur that no further action is needed at these sample locations. We base our concurrence on the fact that all TPH-associated compound concentrations (e.g. BTEX) at these locations were below PRCs for ecological receptors and that groundwater samples adjacent to these locations were non-detect for TTPH and all TPH-associated compounds.</p>	<p>The Navy appreciates Water Board concurrence on NFA for groundwater in this area.</p>
2.	<p>A high groundwater TTPH result of 32.56 mg/L at sampling location 030-FLI-512 necessitated the August 2001 data gap investigation to assess possible floating product at that location. This data gap investigation involved one soil boring advance to 10 feet bgs "within approximately 30 feet" of sampling location 030-FLI-512, where a piezometer was installed and found no floating product. No other confirmation sampling was conducted near 030-FLI-512. Furthermore, no more sampling was conducted at 030-FLI-512 to confirm high TTPH result or indicate if concentration is reducing over time.</p> <p>While we are in concurrence that no floating product is present, based on low levels of BTEX constituents detected in the groundwater at 030-FLI-512 and the lack of floating product observed in the data gap investigation, we question if further site characterization is warranted in order to further evaluate the nature and extent of dissolved TTPH. Without sufficient site characterization, discussion of potential risks to future users, and a proposal for reducing risks associated with this location (if needed), we cannot justify a no further action request at sample location 030-FLI-512.</p>	<p>The Navy has evaluated groundwater data collected in the vicinity of 030-FLI-512 and determined that TPH data have been collected from more than 15 different sampling locations between November 1998 and February 2006. Figure 1, which is presented at the end of this response to comments table, shows a site map (along with TPH data) that were collected in close proximity to 030-FLI-512 in November 1998, in addition to more recent data collected from Site 34 during recent groundwater monitoring activities. These data indicate TPH levels from all carbon (C) atom ranges (i.e., TPH-G: C4-C10, TPH-JP5: C10-C19, TPH-D: C8-C21, and TPH-MO: C20-C60 [http://www.afcee.brooks.af.mil/PRO-ACT/fact/petfuels.asp]) are very low, with all results collected in 2006 being at or below 1 mg/L. In addition, Figure 2, which shows VOC data collected in and around 030-FLI-512 in November 1998 and from Site 34 in 2006 indicates VOC concentrations at very low levels, most being qualified as estimated "J" values. Note that Site 34 and all of its associated wells are located downgradient and in the direction of groundwater flow, which means if elevated concentrations of TPH-JP5 at 030-FLI-512 reported in November 1998 were migrating with groundwater, higher concentrations would have been detected in groundwater underlying Site 34. To the contrary, the recent low-level TPH and VOC data collected at Site 34 indicate there has been no downgradient migration, and presents evidence that the TPH-JP5 detection reported at 030-FLI-512 in November</p>

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Comment Number	Comment	Response
<i>Groundwater Comments (continued)</i>		
2. (continued)		<p>1998 is an anomaly and not reflective of overall site conditions. Note that data presented in Figures 1 and 2 from November 1998 were presented in the original NFA Report for Fuel Line CAA-A dated January 7, 2004, while data from 2006 were collected during groundwater monitoring activities at Site 34 and have not yet been documented in a report. The groundwater data collected in 2006 were collected under a sampling and analysis plan approved by the Navy QA Officer and regulatory agencies, and were validated by a third party validation company. A report documenting the recent Site 34 groundwater data will be issued in August 2007.</p> <p>The data presented in Figures 1 and 2 indicate that potential TPH and VOC impacts in the area and downgradient of 030-FLI-512 is sufficiently characterized, and that no additional characterization is warranted. The Navy requests that the Water Board consider these additional data in the entire context of CAA-A, and approve no further action for the entire CAA.</p>

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Comment Number	Comment	Response
<i>Soil Comments</i>		
1.	<p>This report repeatedly identifies that there was only one soil sample collected with TPH and benzene slightly above residential PRCs (at sample location AP-04). Based on non-detect results for TPH-g and benzene in nearby soil samples AP-01 and AP-05, and non-detect result for benzene in nearby groundwater sample 030-FLI-519, we concur that no further action is needed at this sample location.</p> <p>The narrative discussion in the report does not acknowledge the benzene result from sample location 030-FLI-123, where the detection limit for benzene (3.2 mg/kg) was about 5 times the residential PRC for Benzene (0.65 mg/kg). See Table 2-2 – Soil Analytical Data. The ‘non-detect’ result at this location does not eliminate our concern for this area on its own. Without comparison to nearby samples or collecting confirmation samples using a lower detection limit for benzene, no conclusions can be made regarding this sampling location.</p> <p>The nearest CAA-A soil sample taken was at sample location 030-FLI-124 (about 100 feet away), with all results below PRCs. As sampling location 030-FLI-123 is immediately adjacent to CAA-6, please provide discussion of any results from samples collected in CAA-6 taken near 030-FLI-123 that could indicate whether benzene levels may be a concern at 030-FLI-123. With this in mind, please provide discussion regarding the uncertainty of the benzene result at sample location 030-FLI-123, and further justification for requesting no further action at this sample location.</p>	<p>The Navy appreciates Water Board concurrence on NFA for the soil in this area.</p> <p>Regarding the elevated benzene detection limit at 030-FLI-123, the Navy has evaluated data from CAA-6 and surrounding areas, and determined that additional benzene data in soil exists in the area to further support the request for NFA. The figure inset shown below indicates a total of five soil samples where benzene was not detected, and the detection limits were below the residential PRC of 0.65 mg/kg. The sample ID, sample date, reported benzene concentration, and approximate direction/distance from 030-FLI-123 of these samples are as follows:</p> <ul style="list-style-type: none"> • 037-008-025, 8/29/1995, <0.012 mg/kg, northeast/55 ft • 030-PLU-02, 1/5/1999, <0.12 mg/kg, east/63 ft • 030-FLI-124, 12/7/1998, <0.0006 mg/kg, west/87 ft • 037-008-032, 8/29/1995, <0.012 mg/kg, southeast/108 ft • 035-Z06-002, 3/8/1995, <0.012 mg/kg, southwest/178 ft  <p>Explanation:</p> <ul style="list-style-type: none"> Corrective Action Areas Fuel Lines Soil Sample Locations (Benzene) <p>Note: All benzene data reported in mg/kg. The residential PRC for benzene is 0.65 mg/kg.</p>

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Comment Number	Comment	Response
<i>Soil Comments (continued)</i>		
1. (continued)		These data indicate that potential impacts of benzene to soil at 030-FLI-123, originating from the former fuel line in CAA-A, do not exist. Given that no benzene results were above the detection limit, and all but one of the detection limits were below the residential PRC, it can be concluded that benzene levels in soil at 030-FLI-123 are not a concern and NFA is appropriate.
<i>Minor Comments</i>		
1.	Page 8 – Step 4 – This paragraph mentions this is a non-residential area, whereas the rest of the report identifies this area as mixed use, with potential for residential use. Please correct this discrepancy.	Based on the reuse plan and Preliminary Development Concept, the most accurate description of the planned future use of CAA-A is Parks and Public Open Space. The Navy is not aware of any specific plans that include residential reuse. Nevertheless, the Navy is evaluating this CAA against residential (the most stringent use) criteria.
2.	Tables 4-3 thru 4-7 - Comparison of the AWQC storm drain exposure pathway PRC was done only for samples taken within 30 feet of a storm drain. Please include justification for why this distance was considered appropriate?	While preparing these responses, additional comparisons of the AWQC storm drain exposure pathway PRC were performed for all data presented in Tables 4-3 thru 4-7, and it was confirmed that no exceedances of applicable PRCs exist.
3.	Table 4-8 – Results from 374-001 and PA01-05, while either N/A or N/D, are nevertheless within 250 feet of the shoreline. Footnotes for these results indicate they were not screened because they are greater than 250 feet from the shoreline. Please correct this discrepancy.	TPH constituents in groundwater samples from 374-001 and PA01-05 were not analyzed (NA) and not detected (ND), respectively, and therefore do not result in any exceedances of applicable PRCs. The footnote should have read, “The screening is not applicable because TPH was <i>either</i> not analyzed or <i>not detected</i> , or because the distance from the shoreline is greater than 250 feet.”

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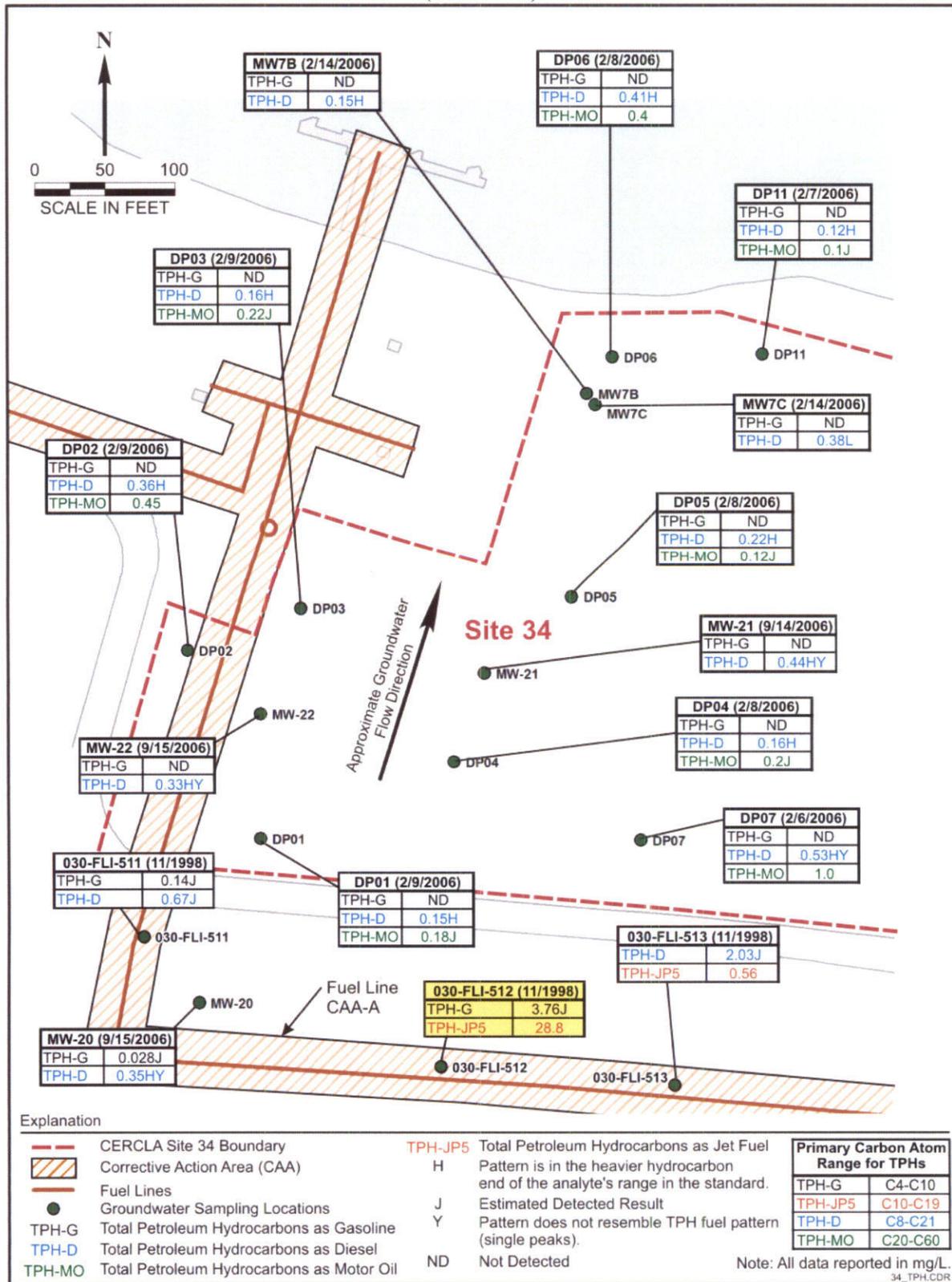


Figure 1. TPH Concentrations Measured in Close Proximity and Downgradient of 030-FLI-512 Indicate Very Low Levels and No Signs of Migration

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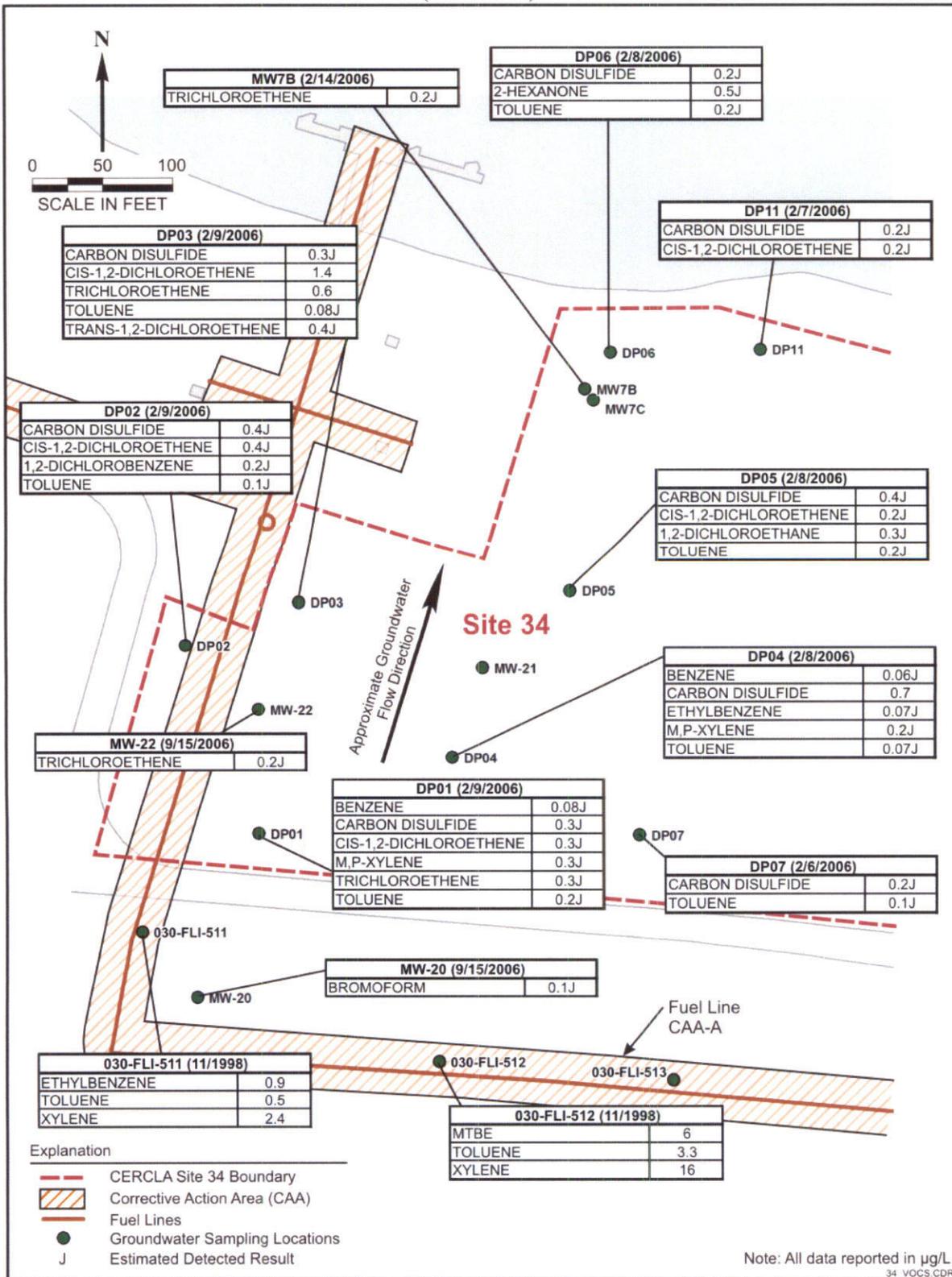


Figure 2. VOC Concentrations Measured in Close Proximity and Downgradient of 030-FLI-512 Indicate Very Low Levels Exist Across the Area