



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



## Department of Toxic Substances Control

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Arnold Schwarzenegger  
Governor

January 24, 2006

Mr. Thomas Macchiarella  
BRAC Environmental Coordinator  
Department of the Navy  
Base Realignment and Closure  
Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, California 92108-4310

PROPOSED PLAN, FORMER NAS ALAMEDA AND ANNEX OPERABLE UNIT  
5/ANNEX IR-02 GROUNDWATER, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

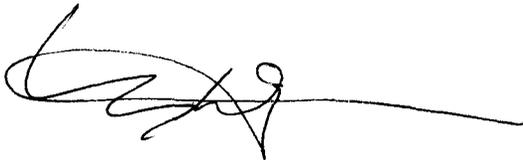
The Department of Toxic Substances Control (DTSC) has received the draft Response to Comments (RTC) on the draft *Former NAS Alameda and Annex Operable Unit 5/Annex IR-02 Groundwater* dated October 31, 2005 for the benzene and naphthalene plume straddling the Alameda Point and former Fleet and Industrial Supply Center Oakland, Alameda Facility/Alameda Annex. The Navy emailed the RTC to DTSC on January 10, 2006. DTSC has reviewed the RTC and participated in comment resolution meetings on January 11 and 17, 2006. This letter transmits the enclosed DTSC Feedback on the RTC.

DTSC concurs with the draft final Proposed Plan if the Navy makes the editorial changes as specified in Items 1 and 8 of DTSC Feedback. In the interest of moving the project forward, DTSC is postponing the resolution of other comments as indicated in DTSC Feedbacks after the Proposed Plan is finalized.

Mr. Thomas Macchiarella  
January 24, 2006  
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If you have any question, please contact me at (510) 540-3770.

Sincerely,

A handwritten signature in black ink, appearing to read 'Henry Wong', with a long horizontal flourish extending to the right.

Henry Wong  
Remedial Project Manager  
Office of Military Facilities

Enclosure

cc: Mr. Greg Lorton  
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Ms. Judy Huang  
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**DTSC Feedback on the Navy's Draft Response to DTSC Comments  
Draft Proposed Plan for Operable Unit 5 /Annex IR-02 Groundwater**

#	Comments (December 16, 2005)	Responses (January 10, 2006)
1	<p>Document Title and Site Name: The apparent title of the Proposed Plan is "Former NAS Alameda and Annex Operable Unit 5/Annex IR-02 Groundwater." DTSC requests the words "Proposed Plan" be prominently identified as the title of the subject document. DTSC requests the Navy refrain from using "Annex," "FISC", "Alameda Annex," and other casual permutations in formal documents to name the former Fleet and Industrial Supply Center Oakland, Alameda Facility/Alameda Annex site. The correct abbreviation in formal documents for this lengthy site name is "FISCA."</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b></p> <p><b>DTSC appreciates the Navy's effort in maintaining consistency with the Administrative Record. However, the title of the RI/FS is "Groundwater Remedial Investigation/Feasibility Study, Alameda Point Site 25/Alameda Annex IR-02," while the Proposed Plan title is "Proposed Plan for Operable Unit 5/Annex IR-02 Groundwater, Former NAS Alameda and Alameda Annex." DTSC had noted the changes from "Site 25" to "Operable Unit 5" and the Navy reasoned that "the areas of Site 25 and OU-5 seem to have changed through time." The Navy is ready to use an appropriate unit name despite the fact that a different name was used in the Administration Record. DTSC supports such unit name change. Unfortunately, the Navy stands firm in using an incorrect site name, citing the need for consistency with the incorrect site name referenced in previous documents.</b></p>	<p>The actual title of the Proposed Plan also includes "U.S. Navy Announces Proposed Plan." This format has been used for Proposed Plans for various Navy facilities. However, to avoid confusion, the title will be repeated. The text above the solid line will be revised to: <b>"Proposed Plan for Operable Unit 5/Annex IR-02 Groundwater, Former NAS Alameda and Alameda Annex."</b></p> <p>The title of the facility to be used in the Proposed Plan was discussed at both previous Alameda Point and FISCA BCT meetings, and no comments were provided. The Proposed Plan is preceded by the Remedial Investigation/Feasibility Study (RI/FS), and consistency of the Administrative Record is important. The facility was referred to as the "Alameda Annex" in both the title and text of the RI/FS. In addition, comments from both EPA and DTSC community relations reviewers stressed the need for a simpler, clearer Proposed Plan. Therefore, the title used in the Draft Proposed Plan was selected to maintain consistency with the Administrative Record, address comments from various agency reviewers, and avoid confusion by the public. The first paragraph of the Proposed Plan explains that the formal name for the Annex is the Fleet and Industrial Supply Center Oakland, Alameda Facility/Alameda Annex (FISCA). Therefore, the Navy does not believe a change to the facility name used in the Proposed Plan is appropriate.</p>

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Draft Proposed Plan for Operable Unit 5 /Annex IR-02 Groundwater**

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	<p><b>In the text of the Proposed Plan, DTSC continues to request the Navy replacing "Alameda Annex" and "Annex" with "FISCA."</b></p>	
2	<p>Institutional Controls: DTSC remains concerned about the potential of benzene and naphthalene vapor intruding into building interiors. In DTSC letter to the Navy dated February 9, 2005 and July 15, 2005, DTSC concluded that the indoor air risk calculation was not acceptable because incorrect source term was used, and indoor air risk for naphthalene as a carcinogen was not evaluated. The Navy's responses to comments failed to address these issues to DTSC's satisfaction. Therefore, DTSC must require institutional controls for all structures within the foot print of the benzene/naphthalene plume as delineated by the 1µg/L benzene isoconcentration line. Such institutional controls will include (a) annual indoor air and/or subslab or crawl space air monitoring for a selected group of existing homes and buildings as proposed during the remedial design, and (b) a sub-slab depressurization system for each new home and commercial/industrial building should the monitoring of existing homes suggest vapor intrusion. DTSC requires both the Proposed Plan and the Record of Decision to include these institutional controls as parts of the remedy for the benzene and naphthalene plume.</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b></p> <p><b>The following statements are excerpted from the Meeting Summary transmitted on August 26, 2005:</b></p> <p><b><i>"Mr. Plaseied said the Navy wants to move forward without conducting indoor air sampling, and asked if</i></b></p>	<p>The February 9, 2005 and July 15, 2005 DTSC letters referenced in this comment have been superseded by more recent events, since these topics were discussed during a meeting between the Navy, U.S. EPA, and DTSC managers Tony Landis and Daniel Murphy, as documented in a letter to Mr. Tony Landis and Mr. John Chesnutt dated August 26, 2005. The final meeting summary documented in this letter incorporated agency comments on the draft meeting summary, and Mr. Landis did not send the Navy any further comments or correspondence. Therefore, DTSC concurrence with the August 26, 2005 letter is understood. The Navy would appreciate it if DTSC comments reflect the most recent meetings, since the Navy has made every effort to work with the DTSC on these issues.</p> <p>DTSC's comment "DTSC must require institutional controls for all structures within the foot print of the benzene/naphthalene plume as delineated by the 1µg/L benzene isoconcentration line" is not a change to the Navy's Draft Proposed Plan. The Draft Proposed Plan submitted to DTSC specifies a risk-based value of 1 microgram per liter (1µg/L) as the RAO for benzene, and institutional controls apply to the area within the 1µg/L benzene isoconcentration line. If DTSC believes this is confusing, please specify text in the Draft Proposed Plan to be clarified.</p> <p>Please see the attached revised institutional controls table.</p>

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	<p><b><i>there are any objections. Mr. Murphy said this opinion is based on discussions with the Schools Unit of DTSC regarding the crawl space beneath the school at Alameda Point Site 30. The Schools Unit wants benzene and naphthalene sampling in the crawl space. Mr. Murphy suggested that such data would provide a clue regarding the rest of the area – if nothing appears, this issue would end. Mr. Murphy said that he'll ask the DTSC risk assessors if the modeling is okay and he'll contact the Navy with the answer. If not, DTSC will make a request to the Navy about such sampling.</i></b></p> <p><b>DTSC has considered the potential of indoor air vapor intrusion with benzene and naphthalene, and has determined that J&amp;E modeling using either soil gas or groundwater data as source term only would not be appropriate because of the shallow (~ 5 to 7 feet bgs) groundwater table.</b></p> <p><b>Therefore, DTSC is making a risk management decision in requiring new institutional controls that have not been evaluated in the feasibility study. DTSC agrees with the Navy in moving the project forward, and is relying on additional institutional controls instead of requiring the project to revert back to the RI/FS and risk assessment stages. DTSC agrees with the Navy's general institutional control statement in the Proposed Plan; however, DTSC requires the Record of Decision to include the indoor air/subslab/crawl space air monitoring for existing buildings and sub-slab</b></p>	<p>Please note that the risk assessment was conducted in accordance with U.S. EPA guidance, where naphthalene is not considered a carcinogen. The U.S. EPA concurred with the RI/FS, which was finalized without dispute.</p> <p>The proposed new institutional control related to indoor air monitoring is inconsistent with the DTSC management meeting. At the time of that management meeting, the only remaining indoor air sampling question was related to required input from the Schools Unit regarding Site 30. That input was received on September 13, 2005 in an e-mail from DTSC.</p> <p>The rationale for no indoor air sampling was provided in previous Navy documents, and there have been no changes to the site conditions or rationale that would trigger indoor air sampling. Subsequent indoor air sampling comments from DTSC dated October 17, 2005 were based on incorrect information, as outlined in the Navy's response issued in mid-December 2005. Extensive data have been collected to date, and detailed technical evaluations have been conducted under the CERCLA process, with U.S. EPA approval. A letter providing a detailed written response to DTSC's October 17, 2005 concerns was issued by the Navy in December 2005. If required, the Navy will be happy to set up a technical meeting with DTSC risk assessors to answer questions and resolve any remaining concerns. Please note that any monitoring required as part of the remediation to ensure that vapor concentrations do not increase because of the remedial activities will be included in the work plan for the</p>

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	<p><b>depressurization system for new buildings as specified in DTSC's comment letter dated December 16, 2005.</b></p> <p><b>DTSC is requiring the above mentioned institutional controls be applied to the benzene/naphthalene plume. As suggested during the January 17, 2006 comment resolution meeting, DTSC is amiable to alter the areas at which the above institutional controls would apply by using a benzene isoconcentration line greater than 1 µg/L. Such determination would need to be technically justified and consistent with arguments raised above. DTSC is ready to work with the Navy in this effort.</b></p>	<p>remediation.</p>
3	<p>Biosparging Performance Standard: DTSC continues to require the Navy to specify benzene and naphthalene target concentrations for groundwater and saturated soil on which biosparging could be stopped and monitored natural attenuation could be commenced. DTSC will also require the Record of Decision to include provisions for restarting the biosparging system after three to five years of unsuccessful attenuation of contaminant concentrations. In the Response to Comment on the Proposed Plan, DTSC needs the Navy to indicate that such numerical target concentration would be specified in the Record of Decision, and that biosparging would be restarted when monitored natural attenuation fails.</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b> <b>DTSC agrees that the estimated 2-year of biosparging and the 6-year monitoring natural attenuation are for cost estimation purpose only. These time frames must</b></p>	<p>The risk-based remedial goals for groundwater, as specified in the Draft Proposed Plan page 6, are 1.0 µg/L for benzene and 100 µg/L for naphthalene. These numerical values are planned to be included in the Record of Decision. Criteria related to performance of the remediation system will be included in the work plan for the remediation. As specified in the response to previous DTSC comments and in the RI/FS, the estimated 2 years of biosparging was provided for cost estimating purposes, and the design will provide the details for the remediation to meet the groundwater goals. The preferred alternative, as specified in the Draft Proposed Plan, consists of biosparging with nutrient and/or microorganism enhancement and SVE, monitoring, and institutional controls. Therefore, it should not be assumed that "provisions for restarting the biosparging system after three to five years of unsuccessful attenuation of contaminant concentrations" would be required. In addition, site-specific data related to</p>

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	<p><b>not be used to determine the treatment durations.</b></p> <p><b>DTSC agrees with Navy that performance standard would be specified in the Remedial Design instead of the Record of Decision. DTSC reiterates that the Remedial Design document must clearly define the following criteria and the regulatory agencies must concur with the criteria before the commencement of biosparging:</b></p> <p><b>1. Benzene and naphthalene target concentrations for groundwater and saturated soil on which biosparging could be stopped and monitored natural attenuation could be commenced; and</b></p> <p><b>2. Provisions for restarting the biosparging system after three to five years of unsuccessful attenuation of contaminant concentrations or reconsider the remedy altogether.</b></p>	<p>system performance, which have not yet been collected, will be obtained during the remedial design and remediation. The Navy will work with the regulatory agencies as the remediation progresses, especially regarding restarting the biosparging system, as required.</p>
4	<p>Remedial Action Objective for Naphthalene in Groundwater: From the response to DTSC comment on the previous draft Proposed Plan, the Navy has not acknowledged DTSC's criteria for terminating the groundwater use restriction in a land use covenant. The California Department of Health Services' Drinking Water Notification Level for naphthalene is 17µg/L; however, this notification level (or other concentration) may become the California Maximum Contaminant Level by the time the Navy is contemplating the removal of the groundwater use restriction. DTSC reiterates that the applicable California drinking water</p>	<p>Table 2. Institutional Controls in the Draft Proposed Plan specifies "The institutional controls may be incorporated and implemented through the following:</p> <p>1. a "Covenant Agreement" with DTSC pursuant to State laws"...</p> <p>The Navy did not get more specific because the "Covenant Agreement" may also address other topics, some of which could be decided at the time the covenant is drafted. The</p>

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	<p>standard at the time would be the remedial action objective for unrestricted groundwater use.</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b>  <b>Please refrain from using the term “Covenant Agreement” to reference the “Land Use Covenant” pursuant to 22 CCR 67391.1.</b></p> <p><b>During the comment resolution meeting on January 17, 2006, the Navy suggested to revise the first sentence, Table 2 of the Proposed Plan as follows (new text is unlined):</b></p> <p><b><i>“Institutional controls described in this Proposed Plan include land use restrictions, which would be established to limit human exposure to contaminated shallow groundwater through non-drinking water use until the risk-based remedial goals in the record of decision (ROD) and ARARs have been reached.”</i></b></p> <p><b>DTSC agrees with the proposed text insertion; however, DTSC reiterates that the applicable California drinking water standard at the time would be the remedial action objective for unrestricted groundwater use.</b></p>	<p>previous paragraph under Institutional Controls in the Draft Proposed Plan states “The Navy plans to use institutional controls to: prevent future use of contaminated groundwater”... Therefore, the Navy believes the existing language in the Draft Proposed Plan addresses this comment. Please see the attached revised institutional controls table. The DTSC comment related to the naphthalene value is noted.</p>
5	<p>Maximum Contaminant Levels (MCL) as Applicable or Relevant and Appropriate Requirements (ARARs): The California Regional Water Quality Control Board believes the deep aquifer underlying</p>	<p>The ARARs discussion in the draft Proposed Plan is consistent with the RI/FS. DTSC’s letter dated July 15, 2005 that “reiterates the unresolved issues on the Groundwater</p>

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	<p>the Alameda Point property east of Saratoga Street is a potential drinking water source. Therefore, both the shallow and deep aquifer must be protected for domestic uses. DTSC has determined that MCL is ARARs for such groundwater at the Alameda Point property. In addition, DTSC has communicated with the Navy repeatedly that the determination of groundwater beneficial use alone is not a remedy for contaminated groundwater. The groundwater beneficial use discussion in page 9 of the Proposed Plan is incomplete. The Proposed Plan must include MCL as ARARs for the subject plume at Alameda Point.</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b>  <b>DTSC agrees to the proposed "agree-to-disagree" language regarding ARARs.</b></p>	<p>RI/FS and Soil FS Report"...does not specify inclusion of MCLs as ARARS as an unresolved issue. In addition, use of the risk-based values specified in the Draft Proposed Plan seemed acceptable based on the management meeting in July 2005 with DTSC management, as documented in the August 26, 2005 Navy letter. The RAO for benzene in the Draft Proposed Plan is the same as the State MCL, and this is stated in the Draft Proposed Plan. Therefore, the Navy would like to proceed as specified in the Draft Proposed Plan. If required, additional justification for risk-based values vs. MCLs can be discussed with DTSC.</p>
6	<p>Page 1, second paragraph: Please specify that both benzene and naphthalene are the primary contaminants for the plume.</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b>  <b>DTSC agrees with the revision.</b></p>	<p>Since these are the COCs, the Navy will revise the referenced sentence to state ... "where benzene <b>and naphthalene</b> are the groundwater contaminants."</p>
7	<p>Page 2, fourth paragraph: Please include the following sentence as the concluding statement of the paragraph: "The Navy, EPA, and DTSC will approve and sign the Record of Decision documenting the final selection of the cleanup remedy."</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b>  <b>DTSC agrees with the Navy's response.</b></p>	<p>The referenced paragraph describes the inclusion of public feedback in the CERCLA process. The referenced DTSC sentence is not related to the subject of this paragraph. In accordance with previous comments from the community relations reviewers for the DTSC and EPA, inclusion of unrelated information such as this would be very confusing to the public. In addition, the ROD approval process will be in accordance with CERCLA and the Alameda Point FFA, and signatories may be different. Therefore, this sentence will not</p>

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		be added.
8	<p>Page 3: The description of the impacted groundwater is incomplete. Please revise the Proposed Plan to include (a) FISCA BRAC Parcels 22, 23, 27, 28, and 30 and (b) the College of Alameda as portions of areas impacted by the benzene and naphthalene plume.</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b>  <b>DTSC continues to require the Proposed Plan to include (a) FISCA BRAC Parcels 22, 23, 27, 28, and 30 and (b) the College of Alameda as portions of areas impacted by the benzene and naphthalene plume.</b></p> <p><b>DTSC requests the Navy to contact the College of Alameda that a portion of its property is within the benzene/naphthalene plume, and the College of Alameda may be one of the parties in the upcoming Land Use Covenant.</b></p>	<p>As resolved in July 2005 and documented in the August 26, 2005 letter to Mr. Tony Landis of DTSC and Mr. John Chesnutt of EPA, it is acceptable to DTSC to provide any plume refinement during the remedial design phase of the CERCLA process. Therefore, no changes will be made to the Draft Proposed Plan.</p>
9	<p>Page 4, sixth paragraph, fifth sentence: Please replace the sentence with the following: "Benzene and naphthalene concentrations appear to increase with depth (greatest concentrations at 20 feet bgs)."</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b>  <b>DTSC agrees with the revision.</b></p>	<p>The words "<b>and naphthalene</b>" will be added to the existing sentence.</p>
10	<p>Page 5, sixth paragraph: For the record, DTSC disagrees with the Navy's risk evaluation for reasons already stated in all previous comment letters on the draft proposed plan and feasibility study</p>	<p>The risk assessment was conducted in accordance with U.S. EPA guidance and was approved by the U.S. EPA.</p>

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	<p>report for the benzene and naphthalene plume.</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b>  <b>DTSC acknowledges that the U.S. EPA approved the Navy's risk assessment. The Navy has offered to host a meeting with the regulatory agencies' toxicologists to address unresolved issues.</b></p>	
11	<p>Page 8, Figure 4: DTSC has requested the footprint of Biosparge Zone 2 be expanded to cover locations OU5-SG-20D and SG-T2-4'. These locations contain two maximum benzene soil gas detections among FISCA and the Alameda Point. The Biosparge Zone 2 coverage as depicted in Figure 4 of the revised Proposed Plan is only slightly altered, but not enough to encompass OU5-SG-20D and SG-T2-4' locations. The eastern limit of Biosparge Zone 2 must be extended beyond the north-south margin aligning with the eastern edge of former Building 366.</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b>  <b>During the January 17, 2006 comment resolution meeting, the Navy requested DTSC to depict the expanded Biosparge Zone 2 to include OU5-SG-20D and SG-T2-4'. DTSC forwarded a Portable Format Document showing the expanded Biosparge Zone 2 to the Navy following the meeting. On January 19, 2006, the Navy informed that Figure 4 would be removed from the Proposed Plan citing that the figure is confusing to the public.</b></p> <p><b>DTSC agrees that Figure 4, which shows the</b></p>	<p>The approximate biosparge zones are based on the groundwater data collected to date and evaluated in the RI/FS. As resolved in July 2005 and documented in the August 26, 2005 letter to Mr. Tony Landis of DTSC and Mr. John Chesnutt of EPA, it is acceptable to DTSC to provide any plume refinement during the remedial design phase of the CERCLA process.</p> <p>The Proposed Plan will be revised to clarify the preliminary, conceptual nature of this sketch on page 8. The first sentence in the middle of page 8 will be revised to state "Figure 4 conceptually shows the approximate locations of the three sparge zones, generally identifying the areas"... The third sentence in the middle of page 8 will be revised to state "...centers exact locations and size will be determined"... The Figure 4 title will be revised to state "...Approximate Locations of the Biosparge Plume Centers."</p>

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	<p>approximate biosparge zone locations, may be removed. However, DTSC expects the Record of Decision to include a figure showing the expanded Biosparge Zone 2 that was depicted in "Max Soil Gas Benzene Detection at SG-T2.pdf" emailed on January 17, 2006.</p>	
12	<p>Page 9, last paragraph: Please define "HSC" before its use.</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b> <b>DTSC agrees with the revision.</b></p>	<p>HSC will be defined before its first use.</p>
13	<p>Page 10, first paragraph: Please delete "BAAQMD" because this acronym is not used in succeeding text.</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b> <b>DTSC agrees with the revision.</b></p>	<p>BAAQMD will be deleted.</p>
14	<p>Page 14: Please spell out "Dept."</p> <p><b><u>DTSC Feedback (January 24, 2006)</u></b> <b>DTSC agrees with the revision.</b></p>	<p>Dept. will be revised to Department.</p>