



Linda S. Adams  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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January 11, 2007

Mr. Thomas L. Macchiarella, Code BPMOW.TLM  
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### REVIEW OF DRAFT RECORD OF DECISION FOR OPERABLE UNIT 1, INSTALLATION RESTORATION SITES 6, 7, 8 AND 16, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the document cited above (OU-1 ROD), dated August 2006. We have also reviewed comments submitted to the Navy by the U.S. Environmental Protection Agency (EPA) and the San Francisco Regional Water Quality Control Board (Water Board) on the OU-1-ROD. We concur with comments submitted by EPA and the Water Board, and will not reiterate those comments. Thus, our comments on the Draft ROD will be confined to a few, broad concerns.

Our primary concern is with the results of the human health risk assessment for soil, which is greater than  $1 \times 10^{-6}$  for residential use of all four OU-1 sites. DTSC policy is that a remedy resulting in cumulative site risk of less than one in one million ( $10^{-6}$ ) is acceptable for unrestricted use. A remedy resulting in a cumulative site risk between one in one million ( $10^{-6}$ ) and one in ten thousand ( $10^{-4}$ ) may be acceptable, with justification, for unrestricted use. Each remedy proposed within that risk range must be evaluated individually to ensure that it is acceptable with regard to human health and the environment. The individual risks of all the contaminants of concern are used to calculate the cumulative risk for a site. DTSC is conservative in making risk management decisions, and requires substantial justification to accept a cumulative site risk of more than one in one million ( $10^{-6}$ ). For DTSC, the Branch Chief is the risk manager who makes the remedy selection decision.

DTSC does not concur that Sites 7 and 8 are appropriate for unrestricted use, based on the material presented in the Draft OU-1 ROD. DTSC is prepared to concur with the ROD for Sites 6 and 16, provided institutional controls to restrict those sites from

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residential and sensitive use (such as hospitals, daycare facilities, and schools) are included.

If you have any questions, please contact me at (916) 255-6449.

Sincerely,

Dot Lofstrom, P.G.  
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