# California Regional Water Quality Control Board
## San Francisco Bay Region

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ALAMEDA POINT
SSIC NO. 5090.3

Department of the Navy
Base Realignment and Closure Program Management Office West
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**Subject: Comments on the Draft Twelve-Month Post-Remediation Site Management Plan, JP-5 Hydrocarbon Spill, Corrective Action Area 6, Alameda Point, Alameda, California**

Dear Mr. Macchiarella:

Upon review of the above mentioned document, dated February 6, 2007, we have the following comments:

**General**

1. This report proposes to fix the storm drain system in and around CAA-6 in order to remove the storm sewer system as a possible pathway for exposure to ecological receptors. This remedial approach is not sufficient in and of itself because contaminated soil surrounding the storm drain system and contaminated groundwater are still a concern. If a remedial approach involves removal of preferential pathways while leaves contamination in place, adequate evidence must be provided to demonstrate that the source has been adequately removed, the contaminant plume is stable, and active natural attenuation is occurring.

**Specific**

1. **Section 2.1, Page 2-1** – Please include the identification numbers for the underground storage tanks (UST) and oil/water separator (OWS) discussed in this section.

2. **Section2.1.1, Page 2-1, second sentence** – This sentence discusses a 2,730 gallon concrete waste fuel vault and a 3,570 gallon OWS. On Figure 2, there is a 2,730 gallon OWS shown, and no 3,570 gallon OWS. Please resolve this discrepancy.

3. **Section 3.1.1 – Page 3-2 – Top paragraph** – On 1/7/03 a petroleum sheen was observed at CA06-16. As a result, the DVE system was restarted. Sample concentrations measured at this location after DVE operations stopped on 9/18/03 (See Table 3) show that TTPH

concentrations have not necessarily decreased. Please include further discussion regarding current contaminant concentrations at this site.

4. **Section 4.1, Page 4-1** – This section mentions that residential and industrial/commercial risk criteria are not applicable to CAA-6, because the proposed future land use for the area is open space for outdoor recreation. Please include discussion regarding potential for odor concerns and identify how you will handle odor nuisance conditions.

5. **Section 5.1, Page 5-1** – Please include detailed rationale for how the 10 monitoring wells (CA06-1 – CA06-4, CA06-6 – CA06-10, and CA06-13) were selected for future quarterly monitoring. From our review of the report, most of these monitoring wells have been in areas that have either not historically had high contamination levels, or currently have low levels of contamination. It seems appropriate to include monitoring wells that represent present and historical source areas (e.g. CA06-5, CA06-16, OB-1, OB-2), areas with previous documentation of contamination near storm drains or with ecological concerns (e.g. CA-06-11 , CA06-14), as well as wells that may represent the edges of the plume.

6. **Section 5.1, Page 5-1, Second Paragraph** – This paragraph mentions that the shallow groundwater at this site is "not of beneficial use". Please rephrase this sentence to mention that the drinking water beneficial use (MUN) for this site meets drinking water exception criteria specified in State Board Resolution 88-63. This exception was granted by the Water Board on July 21, 2003. Other beneficial uses of the ground water at this site include industrial service supply (IND), industrial process supply (PRO) and agricultural supply (AGR).

7. **Section 5.1, Page 5-1, second paragraph** – This paragraph mentions that two wells will be installed as part of the quarterly monitoring program but does not discuss where they will be installed. Please include rationale for well installation and location.

8. **Figure 7** – For consistency, please include results for SB-2 and SB-5 on this figure.

9. **Figure 8** – Please note on this figure if any sampling has been conducted within Hanger 20, and include discussion as necessary.

10. **Figure 10** – Numerous wells are shown on this figure that have, or previously had TPH concentrations above PRC limits for groundwater discharges to surface water (Table 4 of the PRCs). Wells CA06-01, CA06-04, CA06-06, CA06-11, CA06-13,CA06-14, CA06-16, and DVE3 are all close enough to the storm drain, and have had TTPH levels above those specified in Table 3 of the PRCs. Please include detailed discussion regarding this issue in the report.

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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