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ALAMEDA POINT
SSIC NO. 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 10, 2007

Mr. Thomas Macchiarella, Code 06CA. TM
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Re: Review of the Draft Record of Decision for Installation Restoration Site 1, Alameda Point, Alameda, California, April 2006

Dear Mr. Macchiarella:

The U.S. Environmental Protection Agency (EPA) Region 9 has received the Draft Record of Decision (ROD) for Installation Restoration (IR) Site 1, Alameda Point, Alameda, California, dated April 11, 2007. On behalf of the regulatory agencies, DTSC requested a 30 day extension on the review period, making comments due July 10, 2007.

On June 25, 2007, the Alameda Reuse and Redevelopment Authority (ARRA) sent a letter to EPA raising concerns regarding data gaps for Area 1a. Given the significance of the concerns raised, and per the phone conversation between you and Ms. Anna-Marie Cook (the lead RPM for EPA at Alameda Point) on July 3, 2007, all parties agreed to extend the draft review period according to Section 14.2(g) of the FFA. Therefore, the regulatory review for the Draft ROD for IR Site 1 will end once the data gap concerns for Area 1a are resolved and we will forward our final comments on the draft document at that time. In the interim, we are sending you our draft comments which are enclosed with this letter.

We look forward to working with the Navy in addressing the data gap concerns at Area 1a, and moving to draft final on the IR Site 1 ROD.

If there are any questions, please feel free to contact me at (415) 972-3002.

Sincerely,

Xuan-Mai Tran
Remedial Project Manager
Federal Facilities and Site Cleanup Branch

cc: Andrew Baughman, BRAC PMO, West
Erich Simon, SFRWQCB
Dot Lofstrom, DTSC Sacramento
Peter Russell, Russell Resources, Inc.
Suzette Leith, EPA
John Chesnutt, EPA

Draft
Review Comments on the Draft Record of Decision for
Installation Restoration Site 1, 1943-1956 Disposal Area
Alameda Point, Alameda, California
April 2007

GENERAL COMMENTS

1. It is unclear whether any groundwater remedy is needed or being taken to address contaminated groundwater that is migrating to the Bay. Is the In-Situ Chemical Oxidation (ISCO) remedy for groundwater intended to address levels of VOCs that exceed water quality standards for the Bay? Even if it is, that remedy would not appear to reduce high levels of metals in the groundwater. The Declaration and page 5-6 indicate that there are metals in the groundwater, and Table 7-1 includes metals as chemicals of concern in groundwater; however, metals in the groundwater are not discussed in the risk assessment Section (Section 7), and it does not appear that a remedy is being selected to address metals in the groundwater. This needs to be explained. It would be helpful to include a chart comparing the metal concentrations in the groundwater with the relevant water quality standards (CTR or Basin Plan) for San Francisco Bay, with an explanation of why any exceedences do not require action.

2. Based on a discussion during the RAB meeting on June 7, 2007, new groundwater monitoring wells will need to be installed closer to the Bay to enhance the current groundwater monitoring network. This issue will be further discussed during the Remedial Design for IR Site 1. Once new groundwater monitoring wells are in place and if the groundwater monitoring data from these new wells show there is a threat to the Bay, then the ROD will need to be amended to address the contamination.

3. The Declaration on page D-2 indicates there is no risk to aquatic life in the area of groundwater discharge into the Bay, but page 12-1 indicates that groundwater poses a potential risk to aquatic ecological receptors, and page 8-1 states that remediation goals (RGs) were designed to be protective of ecological receptors in the Bay. It is unclear whether action is being taken to protect aquatic receptors.

4. It appears that the purpose of the selected ISCO remedy for groundwater is to protect humans from the risk of inhalation of VOCs. However, the document does not explain how the selected RGs are protective of inhalation risk.

5. On June 25, 2007, the Alameda Reuse and Redevelopment Authority (ARRA) sent a letter to EPA raising concerns regarding data gaps for Area 1a. We look forward to working with the Navy to address these concerns.

6. Throughout the Draft ROD for IR Site 1, the text regarding the containment presumptive remedy could mislead the readers to the conclusion that the containment presumptive remedy is appropriate for IR Site 1 landfill. Please revise the text so that it is clear that a

containment presumptive remedy has not been used for IR Site 1 and show in the alternatives analysis that the proposed remedy is protective of human health and the environment. The alternatives analysis may include the results of activities undertaken to address the data gap concerns raised by the ARRA.

SPECIFIC COMMENTS

1. **Declaration, Page D-2, first paragraph:** This paragraph is confusing because it mentions contaminants that are not being addressed in this ROD, and is not consistent with section 7.1.4.1 on page 7-7. If this paragraph is meant to discuss the historical investigations, then the verbs should be changed to past tense. Alternatively, the paragraph could be re-written to indicate what chemicals need to be remediated and will be remediated under the remedies selected in this ROD.

2. **Declaration, Page D-2, description of the selected remedy for soil:** In the first bullet, we recommend briefly discussing what Area 1a is and what Area 1b is, as is done in the first bullet on page 5-4.

3. **Declaration, Page D-3, first and third bullets:** The discussion suggests that when the TCRA is completed, no further action will be necessary. Will the TCRA be completed before the ROD is finalized? If not, these portions of the site will need to be included in a subsequent no further action ROD.

4. **Section 7.1.1, Identification of Chemicals of Concern, Page 7-3:** The last sentence in this section states that groundwater results were compared with potential ARARs. Where in the document is this done? Also, wasn't groundwater also evaluated for inhalation risk? If so, that should be stated.

5. **Section 7.1.2, Exposure Assessment, Page 7-4, last paragraph:** The document states that residential reuse is not appropriate for most of Site 1 because it is part of Public Trust Land. It would be helpful to indicate whether this is considered State, federal, or local public trust, and what is the legal authority for this.

6. **Section 8.0, Remedial Action Objectives:** Given that the inhalation risk seems to be rising (page 7-3), and one of the ICs is to install ventilation systems in new buildings, there should be an RAO to protect humans from inhalation risk.

7. **Section 8.2, Groundwater, Page 8-1, second paragraph:** In next to last line, please add "exceeding those" following "concentrations."

8. **Section 8.2, Groundwater, Page 8-2, and Tables 8-1 and 8-2 and Table 13-1 (Page 6 of 6):** In several places, the document references "Enclosed Bays and Estuaries Plan (SWRCB 2000)." However, "SWRCB 2000" is identified in the reference list as a different document. Also, it's preferable to use the whole name for the document, as in Table 13-1, since the Enclosed Bays and Estuaries Plan was a different document.

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9. **Table 8-1, Remedial Goals for Human Receptors, VOC RGs:** It is not clear whether these RGs are set at levels adequate to protect against inhalation for a recreational visitor, whether they are sufficient to protect against inhalation from persons working in buildings with the required ventilation system, and whether these are the goals for the ISCO remedy.

10. **Table 8-2, Remedial Goals for Ecological Receptors:** The mercury goal should be identified as coming from the Basin Plan, not the CTR.

11. **Table 8-2, Remedial Goals for Ecological Receptors:** There needs to be more explanation concerning Footnote a regarding sediment screening criteria for wetlands cover soil. Should this be an ARAR? Also, the footnote states that RGs for Area 5 "will consider" these criteria. Shouldn't the RGs be set now, in the ROD?

12. **Section 9.1.1, Area 1 Soil Alternatives, Page 9-1:** We recommend mentioning Area 1a in this introductory paragraph.

13. **Section 9.1.1.2, Alternative S1-2 - Soil Cover, Wetlands Mitigation Plan, and ICs, Page 9-2, first complete paragraph:** Please explain the basis for the statement "Wetlands mitigation is assumed to be required at a 1:1 ratio for the acreage of seasonal wetlands affected by this alternative."

14. **Section 9.1.1.2, Alternative S1-2 - Soil Cover, Wetlands Mitigation Plan, and Institutional Controls, Page 9-2, last sentence of the first complete paragraph:** Please justify the statement "No fencing or signage would be included."

15. **Section. 9.1.2.2, Alternative S2-3 - Pavement Maintenance and ICs, Page 9-3, and Section 12.2.1.2, Soil Area 2: Alternative S2-3, Pavement Maintenance, Page 12-8.** The pavement-maintenance remedy as discussed in these sections, most specifically on page 12-8, appears to be an IC, as it includes requirements a transferee will have to undertake. Please add it to the IC discussion.

16. **Section 9.1.3.2, Alternative S3-4 - Tier 2 ERA, Relocation of Soil Exceeding Remediation Goals, and ICs, Page 9-4:** Wouldn't there need to be a wetlands mitigation plan? Section 9.1.3 mentions WMP, but none of the alternatives do.

17. **Section 9.1.5.2, Alternative S5-3 - Confirmation Sampling and ICs, Page 9-7, discussion of sediment screening criteria for wetlands cover soil (Water Board 1992):** Please give a short explanation of what is wetlands cover soil.

18. **Section 9.1.5.4, Alternative S5-5 - Confirmation Sampling, Relocation of Soil Exceeding Remediation Goals, Shoreline Debris Relocation, and ICs, Page 9-8:** Discussion of excavation and earthquake-induced lateral spreading is confusing. If this alternative is not selected (which the ROD indicates it won't be), then is there a danger of earthquake-induced lateral spreading? How is that being addressed?

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19. **Section 9.1.6, Site-Wide Radiologically Impacted Soils, Page 9-9:** In the first paragraph, line four, please eliminate "in 2006"; please change "was" to "were." In line six, please change "that would" to "in order to."

20. **Section 9.1.6, Site-Wide Radiologically Impacted Soils, Page 9-9:** It would be helpful to the reader for the document to indicate which alternative is being implemented through the TCRA (S6-4?).

21. **Section 10.1.2.4 and 10.1.3.4, Reduction of Toxicity, Mobility, or Volume through Treatment:** These sections should briefly explain why the excavation options rate medium, as was done in sections 10.1.1.4, 10.1.4.4, and 10.1.5.4.

22. **Section 12.1, Summary of the Rationale for the Selected Remedy, Page 12-1, first line:** Please change "poses" to "pose."

23. **Section 12.1, Page 12-2, description of remedy for Area 3:** We recommend mention of the WMP part of the remedy in this paragraph.

24. **Section 12.1, Page 12-3, description of remedy for site-wide radiologically impacted soil:** In second line, we recommend removal of words "which will be covered," as this suggests that Area 1a will be covered under a TCRA.

25. **Section 12.2.1.1, Page 12-5:** We recommend re-writing the paragraph between the bullets as follows: "Once the property is transferred, the following are the legal mechanisms that will be used to implement the IC objectives to be achieved through land use restrictions for this site."

26. **Section 12.2.1.1, Page 12-6, second bullet:** In the second line, after the Navy and DTSC, please add "and EPA."

27. **Section 12.2.1.1, Page 12-6, last line:** The statement of the duration of the ICs is incorrect, as the remedy does not contemplate unrestricted use of the property, and the ICs are expected to be permanent. Please use the language from the IC checklist: "ICs will be maintained until the concentrations of hazardous substances in the soil and groundwater are at such levels to allow for unrestricted use and exposure."

28. **Section 12.2.1.1, Page 12-7, second bullet:** Instead of "or", we recommend "and/or."

29. **Section 12.2.1.1, Page 12-7, last paragraph:** In two places, please say "ICs" rather than "IC objectives."

30. **Section 12.2.1.3, Soil Area 3: Alternative S3-4, Page 12-9, discussion of ICs:** The language here is confusing, and we recommend using the language from the parallel section on page 12-10.

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31. **Section 12.2.2.5, Institutional Controls, Page 12-11:** There needs to be an IC objective to protect against vapor intrusion over the VOC plume. This is included as part of the remedy in other parts of the document (e.g. Declaration p. D-3, page 9-11 incorporating remedies ICs from page 9-10), but is missing from this section.

32. **Section 12.2.2.5, Page 12-12:** The last sentence in this section is incorrect, as the groundwater remedial goals do not contemplate unrestricted use. Please instead use the language from the IC checklist discussed above (specific comment 27).

33. **Figure 12-1, Site 1 ICs:** This map is confusing, as it is not clear whether the ICs would cover areas 1b and 4.

34. **Page 13-2 and Table 13-1, PCB ARARs:** On page 13-2, the "B" should be capitalized in 761.61(a)(4)(B). Why isn't 761.61(a)(4)(B) included in the ARARs table (Table 13-1, page 1 of 6)? Why does the ARARs table limit these ARARs to PCB concentrations greater than 50 ppm?

35. **Page 13-2, Radiological ARARs:** Why is 40 CFR 192.12(a)(2) not included as an ARAR?

36. **Section 13.2.1.1, Page 13-2, Federal:** Discussion of radiological contamination is confusing. Is the Navy identifying only 10 CFR 20.1403 for Area 1a and only10 CFR 20.1402 for the rest of Site 1, or is it also identifying the regulations mentioned earlier in the same paragraph for those areas?

37. **Section 13.2.1.2, Groundwater, Page 13-3:** We recommend adding to the introductory paragraph some of the rationale from Section 5.2 as to why this groundwater is not considered potential drinking water (or at least a cross-reference to Section 5.2), so as not to imply that groundwater underneath a landfill generally does not need to be remediated.

38. **Section 13.2.1.3, Surface Water, Page 13.5, and Table 13-1, Page 5 of 6:** Discussion of federal surface water ARARs is confusing. It is not clear whether the Navy is including CTR standards and effluent limitations as ARARs for the situation where contaminated groundwater flows into the surface water. EPA's position is that the CTR standards are ARARs for this situation, as are State water quality standards. We do not consider "best available technology" requirements to be ARARs in this situation, although we do if there is an active discharge of treated groundwater or wastewater to surface water.

39. **Section 13.2.3.1, Page 13-9, soil cover ARARs:** The ROD should briefly explain why 22 CCR 66264.310(a)(1) is not relevant and appropriate.

40. **Section 13.2.3.1, Page 13-10, last line:** Instead of the sentence beginning "EPA specifically considers", please use the sentence regarding EPA's position found in the ARARs table, page 10 of Table 13-3.

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41. **Section 13.5, Preference for Treatment as a Principal Element, Page 13-14:** Please explain how do the selected soil remedies satisfy the preference for treatment?

42. **Table 13-1, Pages 4 and 5, Basin Plan chapters 2 and 3:** Why are the pertinent WQS identified in the "comments" column as narrative? Some are numeric, e.g. mercury.

43. **Table 13-3, Pages 11 and 12, Pavement Maintenance ARARs:** (a) The heading on page 11 is "Pavement Maintenance (Continued)." That is confusing, as it appears that the Pavement Maintenance ARARs begin on page 11 and are not continued from a previous page. (b) In the last column, the comment should indicate that the various requirements are relevant and appropriate for the pavement maintenance as well as the soil cover. (Page 13-11 includes these requirements as ARARs for pavement maintenance.)

44. **Table 13-3, Page 13, point of compliance:** It is not clear why this requirement is an ARAR for groundwater monitoring. EPA's position is that RGs need to be met throughout the aquifer.

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