



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Arnold Schwarzenegger
Governor

August 16, 2007

Mr. Thomas L. Macchiarella
Code BPMOW.TLM
Department of the Navy
Base Realignment and Closure Program
Management Office West
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San Diego, California 92108-4310

DRAFT RECORD OF DECISION (ROD) FOR IN INSTALLATION RESTORATION SITE 1, 1943 -1956 DISPOSAL AREA, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control has reviewed the Draft ROD for Installation Restoration Site 1, dated April 2007. Comments from the DTSC Office of Military Facilities and the California Department of Public Health (formerly California Department of Health Services) are included as an attachment to this letter.

Our overarching concerns are as follows:

- 1) Please refrain from referring to the "Presumptive Remedy" for this site. Site 1 is not a candidate for the United States Environmental Protection Agency guidance "Application of the CERCLA Municipal Landfill Presumptive Remedy to Military Landfills."
- 2) A groundwater detection monitoring system will need to be installed at the site that is capable of detecting the earliest possible indication of a release.
- 3) Since Alternative S5-5 or S5-6 was not selected, which would have included conducting test pits at the shoreline and ensuring that the waste is at least 25 feet back from the shoreline, please be sure to include waste delineation and setback as part of the remedial design to fulfill seismic concerns.
- 4) The Remedial Goals as listed in Table 8-1 should be protective of human health and thus established based on a cancer risk of 1×10^{-6} , not 1×10^{-5} .

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It is my understanding that the Navy is currently planning on excavating trenches in the waste disposal area to confirm previous assumptions regarding the presence/absence of intact drums and waste volume estimates. DTSC supports this endeavor and I look forward to the subsequent results. If you have any questions, please contact me at (916) 255-6449.

Sincerely,



for Dot Lofstrom, P.G.
Project Manager
Office of Military Facilities

Attachment

cc: Mr. Peter Russell
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Mr. Thomas L. Macchiarella
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ATTACHMENT

DTSC Comments on the "Draft, Record of Decision for Installation Restoration Site 1, 1943 – 1956 Disposal Area," dated April 2007.

- 1) Declaration, page D-2, first bullet The discussion of Area 1 alludes to the time critical removal action (TCRA) without naming it. This bullet might be less confusing if the TCRA is introduced in this paragraph, rather than waiting for the 4th bullet (Area 4).
- 2) Declaration, page D-2, first bullet The last sentence states that if soil gas sampling results indicate possible accumulation of landfill gas and migration in buildings, the Navy will implement institutional controls (ICs) to require subslab passive venting systems and vapor barrier systems for new buildings. It is premature to specify such an IC. The decision to use vapor barriers and/or passive or active venting system requires site-specific, detailed analysis and should not be presumed prior to investigation and analysis. It is not known at this time if a passive or active venting system might be needed, or if vapor barriers would be appropriate at this site. Please revise to indicate that ICs to restrict the installation of permanently occupied buildings on the waste disposal site will be implemented.
- 3) Declaration, Page D-3, first bullet, Area 4 The text states that following the TCRA, no ICs or further response action will be required for Area 4 after the TCRA. This is corroborated in Figure 12.1, where Area 4 and 1b seem to be excluded from ICs. This is not clear in other text throughout the Site 1 Draft Record of Decision (ROD), however. For example, it is not clear in the first bullet on page D-2 that Area 1b will not have ICs. Please be clear regarding ICs for Area 1b and Area 4, throughout the text.
- 4) Declaration, page D-3, last bullet The last sentence states that an IC will be implemented that specifies that the Navy will implement ICs to require subslab passive venting systems and vapor barrier systems for new buildings. It is premature to specify such an IC. In general, it is inappropriate to construct buildings above a volatile organic compound (VOC) plume. The decision to use vapor barriers and/or a passive or active venting system requires site-specific, detailed analysis and should not be presumed as a matter of course. It is not known at this time if building construction would be appropriate, if a passive or active venting system might be needed, or if vapor barriers would be acceptable above the VOC plume. Please revise to indicate buildings will not be constructed over the VOC plume until remedial goals (RGs) have been met or soil gas sampling results indicate there will not be negative impact to human health from vapor intrusion of indoor air into new buildings.
- 5) Declaration, Page D-6, Checklist item Please revise the statements regarding the EPA guidance "Application of the CERCLA Municipal Landfill Presumptive

Remedy to Military Landfills,” (Presumptive Remedy). The Presumptive Remedy does not apply to Site 1. This comment also applies to:

- Section 2.2, page 2-3, third paragraph.
- Section 2.2, page 2-4, first paragraph.
- Section 5.0, page 5-1, first paragraph.
- Section 5.3.1, page 5-4, second paragraph.
- Section 7.1.1, page 7-3, second paragraph
- Section 7.1.2.2, page 7-5.

6) Section 5.3.1, Figure 5.1 Figure 5-1 entitled “Soil Contamination Areas” does not illustrate soil contamination. A similar figure in the Feasibility Study (FS) (Figure 2-25) was entitled “Feasibility Study Soil Areas.” Figure 5-1 of the draft ROD should show the locations of soil samples collected from the various soil areas so that the sample density in each area can be observed. Figure 2-26 of the FS could be used.

7) Section 5.3.2, page 5-6

- The draft ROD does not define the three groundwater areas discussed in this section. These areas should be defined and illustrated on figures. A map showing the limits of the “VOC plume area” should be included, and the plume contours should be provided (such as Figure 2-28 of the FS). First Water Bearing Zone and Second Water Bearing Zone monitoring wells within the VOC plume area and outside the VOC plume area should also be shown on a map (such as Figure 3-1 of the FS).
- According to the FS, reported concentrations of chlorinated VOCS in the groundwater VOC plume are indicative of residual dense non-aqueous phase liquid (DNAPL) in the subsurface. A discussion of the likelihood of DNAPL should be included in the nature and extent, description of alternatives, comparative analysis, and remedy selection sections.
- The second sentence of the last paragraph states that chemical concentrations found outside the plume area were lower than concentrations found inside the plume area. However, it should be clarified that this statement only applies to organic chemicals. Metals were detected at similar or higher concentrations outside the VOC plume area.

8) Table 8-1 Remediation Goals According to footnote “a” the remediation goals for hexavalent chromium, benzo (a) anthracene, benzo (b) fluoranthene, benzo (a)

pyrene, indeno(1,2,3-cd)pyrene, and dibenzo(a,h)anthracene were established based on a cancer risk of 1×10^{-5} for the recreational user. DTSC does not agree that a cancer risk of 1×10^{-5} for the recreational user is appropriate for this site, particularly since this RG will be applied in the beach area. The RGs should be based on a cancer risk of 1×10^{-6} , not 1×10^{-5} .

- 9) Section 9.1.1.4, page 9-2 The first statement describes off-site disposal of soil from the burn area. The Navy has indicated in recent electronic mail (e-mail) communication to the regulatory agencies that soil that has been screened and shown to be free from 1) radiologic hazard, 2) materials potentially presenting an explosive hazard, and 3) chemical contamination may be replaced back in the burn area. Please update this paragraph, accordingly.
- 10) Section 9.1.3.2, page 9-5 Given the problem of finding clean soil with metals less than ambient background metals at Alameda Point, the Navy might need to look for an onsite source to backfill soil that was excavated in Area 3.
- 11) Section 9.2.3, page 9-1 DTSC agrees that a corrective action groundwater monitoring program, as described in title 22 of the California Code of Regulations (CCR), Section 66264.100 is the appropriate groundwater monitoring program for the VOC plume. However, the area outside the VOC plume should be monitored with a detection groundwater monitoring program, as described in 22 CCR 66264.98.
- 12) Section 12.1, pages 12-1 and 12-2 Throughout this Section and elsewhere in the ROD, the text states that excavation and/or disturbance of soil in areas outside the boundary of Area 1a is prohibited unless the transferees gain regulatory and Navy approval and complies with a risk management plan. Compliance with a risk management or site management plan is appropriate for all sites on Alameda Point. However, we question the need for Navy approval prior to any disturbance of the soil outside of the waste disposal area. Moreover, the transferee should not be required to seek Navy and regulatory approval before making minor ground-disturbing activities, providing there is a well-written plan that foresees various possible exposure scenarios and describes safe work practices. The ROD should be clear that a risk management or site management plan can be developed that will allow the transferee to develop standard procedures and contingencies so that regulatory and Navy approval is not required for minor ground-disturbing activities outside of Area 1a. The Site Management Plan for the adjacent Fleet and Industrial Supply Center/Alameda Annex (FISCA) is an example of such a plan.

- 13) Section 12.2, page 12-5 Please revise the first sentence of the last paragraph to state that the Covenant to Restrict Use of Property will incorporate Land Use Restrictions into environmental restrictive covenants that run with the land.....”
- 14) Section 12.2.1.3, page 12.8 A survey to determine the presence of migratory birds and active nests will be made within 72 hours of any ground disturbance activities for Alternatives S3-4 and S5-4. The text states that if any nests are found, they will be allowed to fledge before excavation, but that if this is not possible, the eggs/chicks will be taken to a licensed wildlife rehabilitation for captive rearing. Please add that California Department of Fish and Game approval will be required before disturbing any eggs and/or chicks or relocating them offsite.
- 15) Section 12.2.1.5, page 12-9 This section is titled “Confirmation sampling.” It’s not clear what the Navy is confirming.
- 16) Section 12.2.2.2, page 12-11 The text states that Fenton’s Reagent will be used for the in-situ chemical oxidation. Is the Navy confident that Fenton’s Reagent will be used?
- 17) Section 12.2.2.4, page 12-11 The appropriate groundwater monitoring program for the area inside the VOC plume is a corrective action groundwater monitoring program, as described in 22 CCR 66264.97(b)(D) and 66264.100. Please add the citation of 22 CCR 66264.100 (which incorporates the previous citation) to this section. For areas outside the VOC plume, a detection monitoring program as described in 22 CCR 66264.97(b) (B) and 66264.98 is the appropriate groundwater monitoring program. 22 CCR 66264.97(b)(B) requires:
- (B) for a detection monitoring program under section 66264.98:*
 - 1. A sufficient number of monitoring points installed at appropriate locations and depths to yield groundwater samples from the uppermost aquifer that represents the quality of groundwater passing the point of compliance and to allow for the detection of a release from a regulated unit;*
 - 2. a sufficient number of monitoring points installed at additional locations and depths to yield groundwater samples from the uppermost aquifer as necessary to provide the best assurance of the earliest possible detection of a release from the regulated unit; and*
 - 3. a sufficient number of monitoring points and background monitoring points installed at appropriate locations and depths to yield groundwater samples from other aquifers, low-yielding saturated zones, and from*

zones of perched water as necessary to provide the best assurance of the earliest possible detection of a release from a regulated unit.

Note that the goal of a detection monitoring program is to provide the earliest possible detection of a release. Contrast this with the goal of a corrective action monitoring program, which is to evaluate compliance with the water quality protection standard and to evaluate the effectiveness of the corrective action program (22 CCR 66264.97) (a) (D). Thus the goal for a groundwater monitoring system associated with the VOC plume is not the same as the goal for a groundwater monitoring system outside the VOC plume, and two different programs (detection and corrective action) apply.

MINOR EDITS/TYPOGRAPHICAL ERROR(S)

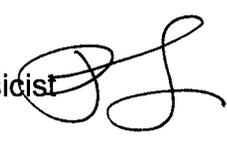
On page page 13-10, fourth paragraph, the word "forth" is mistyped as "for," in the phrase, "...sets for the following "relevant and appropriate" substantive criteria...."



California Department of Public Health
MEMORANDUM

DATE: July 6, 2007

TO: Dot Lofstrom, P.G.
Senior Engineering Geologist
Office of Military Facilities
Department of Toxic Substances Control (DTSC)
8800 Cal Center Dr.
Sacramento, California 95826-3200

FROM: Penny Leinwander, Senior Health Physicist 
Environmental Management Branch
PO Box 997377
1616 Capitol Ave., MS 7405
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(916) 449-5921

SUBJECT: Comments on the Draft Record Decision for Installation Restoration Site 1, 1943-1956 Disposal Area, Alameda Point, California, issued April 11, 2007.

The California Department of Public Health (CDPH) has reviewed the subject document. At this time CDPH could not confirm that the selected remedies will ensure public health and safety because the document does not provide the information necessary to make this determination. Attached are specific comments that address the lack of information and clarity in the document and what additional information should be included. This review was performed Robert Wilson (Associate Health Physicist), in support of the Interagency Agreement between DTSC and DHS.

If you have any questions concerning this review, or if you need additional information, please contact Robert Wilson at (916) 449-5688.



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MEMORANDUM

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Senior Engineering Geologist
Office of Military Facilities
Department of Toxic Substances Control (DTSC)
8800 Cal Center Dr.
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FROM: Penny Leinwander, Senior Health Physicist
Environmental Management Branch
PO Box 997377
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A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

DATE: July 6, 2007

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If you have any questions concerning this review, or if you need additional information, please contact Robert Wilson at (916) 449-5688.

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California Department of Public Health Review

Activity: Review Comments for Draft Record of Decision for Installation Restoration Site 1, 1943 – 1956 Disposal Area, Alameda Point, California. Issued April 2007

July 10, 2007

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General Comments:

1. As important as this primary document is to the numerous entities that have significant responsibilities and stakes in the future of Installation Restoration Site #1, CDPH is concerned about the lack of sufficient detail presented in this Record of Decision (ROD).

In general, CDPH is requesting detailed maps depicting the final remedies in areas affected by the remedial actions selected in this Record of Decision.

While CDPH understands the Navy cannot produce a definitive version of the final soil cover/caps, detailed maps can provide a reasonable depiction of the Navy's proposed final intent of a soil cover/cap prior to property transfer.

Therefore, CDPH is requesting the following:

- Scaled elevation and plan views of the soil covers/caps in their proposed final condition prior to property transfer.
 - Ensure that the maps correlate with Figures D-1 and 5-1 of the ROD.
 - Excavated areas subject to fill material only and not capped or covered shall be included on the maps (see to Specific Comment # 5).
 - Paved areas subject to and not subject to soil cover/capping will be displayed on the maps and labeled (see Specific Comment # 6).
 - The soil cover/cap extending into all of the shoreline areas must indicate the locations of soil cover/cap termination, including sloping, if applicable. (see Specific Comment #10).
2. Page D-6, Data Certification Checklist of the Declaration section:

The Navy states that the remedy selection of a soil cover for IR Site# 1 is in accordance with EPA's guidance entitled "Application of the CERCLA Municipal Landfill Presumptive Remedy to Military Landfills" (EPA 1996a).

Does this EPA guidance apply to military landfills that are built on artificial land masses, such as IR Site # 1 of Alameda Point, or on native soil or both?

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July 10, 2007

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General Comments (cont.)

3. To date, CDPH has not received the Radiological Characterization Survey (RCS) Report for the November 2006 radiological survey of the shorelines of IR Site# 1 (including the shorelines of IR Site #2 and the entire area of IR Site# 32). The RCS Report is to contain results from the shoreline surveys and is subject to review by regulatory agencies prior to finalization. Currently, the only available survey results are located in Figure 2-1 of the IR Site# 1 TCRA and due to the survey data being unpublished and not having been subject to regulatory agency review, the validity and the applicability of the data is questionable. In the meantime, the Navy has drafted and finalized an IR Site#1 TCRA Work Plan that resembles part of a Navy selected remedy in the ROD addressing site-wide radiologically impacted waste. CDPH is aware of and is requesting clarification of the statement on page 5-6 of the ROD: “Radiological anomalies were addressed as part of a TCRA and are not addressed by any remedy in this ROD.” This statement appears to contradict the Navy’s current TCRA strategy and its ROD selected remedy (S6-4), in addition, it appears that the Navy has made the decision to enact the ROD in a premature manner through a TCRA that was based on the premise of locating and removing materials potentially presenting an explosive hazard (MPPEH).

While the Navy views the TCRA of the radiologically impacted waste in conjunction with the removal of the MPPEH as a cost saving measure, the lack of timely review of the shoreline radiologic survey results, specifically for Area 5b, may result in additional costs to the Navy by the possible data supplementation of re-surveying the same locations due to possible errors in the previous surveys. CDPH is aware that Area 5b is one of the “radiologic anomalies that were addressed as part of a TCRA and are not addressed by any remedy in this ROD”, even though Area 5b is addressed in the Navy selected remedy S6-4.

4. Prior to the publication of this Draft ROD, the current IR Site #1 TCRA and future ROD related removal actions have used and will use radiological survey results to justify the location and removal of radiologically impacted wastes that can only be detected to a limited depth from the ground surface. There are some unknown factors, such as, (1) the extent, orientation and depth of radiological impacted waste, (2) the determination if the sources of radioactivity are dispersed as loose material or a discrete concentration (such as a deck marker or aircraft instrument dial face), and (3) the lack of historical records detailing past operations involving the disposal of radioactive wastes.

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General Comments : (cont.)

With these unknown factors in mind, Areas 3 and 5 within IR Site#1 will be subject to excavation and off-site removal of detected radiological anomalies and the excavated areas scanned to ensure complete anomaly removal and backfilled with clean soil. The unexcavated locations of Areas 3 and 5 can only be assumed by the Navy as free of radiologic anomalies to a limited depth of detection. This limited depth of detection has been specified by the Navy as between 18 – 20 inches below ground surface.

It should be noted that Areas 3 and 5 are proposed to have ICs implemented, but are currently not subject to a soil cover as part of a Navy selected remedy. Therefore, based upon the limited knowledge of potential radiologically impacted waste that may be present beyond the detection depth of 18 – 20 inches below ground surface, CDPH is requesting the Navy to incorporate this uncertainty in the ROD, and within the ICs, when ICs are stipulated in each alternative remedy.

5. CDPH is aware that some ROD proposed remedies for IR Site# 1 will involve Area 1 in that Area 1a will potentially receive excavated soil from Areas 3 and 5 that exceed remediation goals. In addition, this contaminated soil will be consolidated in Area 1a and covered with the 4-foot-soil cover for Area 1.

Will part of Area 1a be excavated to accept the consolidated waste soil or will the contaminated soil be placed on the surface of Area 1a and covered with a 4 foot soil cover? Will the excavated soils from Areas 3 and 5 be screened for radiologically impacted wastes prior to placement in Area 1a? Or disposed off-site as stated in the Navy selected Alternative S6-4? Please clarify these issues in the ROD.

6. It is unclear what recreational activities will be allowed based on the description of the Institutional Controls. For instance, if there is a beach area, will there be restrictions on digging at the beach? How will this be enforced? What are the exact recreational activities that will be allowed?
7. Due to the lack of timely distribution on several occasions, CDPH did not have the opportunities to perform the required regulatory agency reviews of the draft and draft final versions of the Proposed Plan for IR Site# 1 documents. It was approximately 30 days after the Record of Decision (ROD) for IR Site# 1 had been issued to the regulatory agencies that CDPH received a draft copy of the ROD for review and a final version of the Proposed Plan for IR Site# 1 to peruse.

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8. Please note that some of the Specific Comments below address selected soil remedies that may not be specific to site-wide radiologically impacted waste and CDPH is aware that Soil Alternatives S6-1, S6-4 and S6-5 are aimed specifically at addressing such site-wide waste.

Nevertheless, some of the Specific Comments by CDPH are to provide emphasis of the radiological uncertainties relative to subsurface conditions in the areas not subject to a soil cover and/or institutional controls. And, it must be emphasized that a Final Status Survey of areas subjected to remedial actions involving the removal of radiological materials from the surface of the soil does not release the subsurface soil free from institution controls and unrestricted use. This emphasis applies to “radiologically impacted soil in all areas except Area 1a” as quoted in page 12-3, Section 12.1

Specific Comments:

1. Page D-3, Bullet item “Site Wide Radiologically Impacted Soil.”:

The second sentence is confusing and may need rephrasing; is Area 1a covered under a CERCLA TCRA or are the current excavations of areas that are radiologically impacted soil site-wide covered under a CERCLA TCRA?

The third sentence ends with the phrase “except in Area 1”; is this Area 1a or Area 1b or Area 1 as a whole unit?

2. Page 2 of 9, Table 2-1, “Radiological Surveys, 1995-2004” category:

The “Pilot-Scale Demonstration (Funnel and Gate)” activity is not related to radiological surveys and it needs to be removed and re-inserted, with its related information, in its proper category within the “Summary of Investigation Activities” Table.

3. Page 2-5, “Investigation Activities” section:

Please include the Radiological Survey at the Shorelines of IR Site#1, 2006, as a listing within the “Investigation Activities” section and Table 2-1 of this ROD. This survey was part of broader radiological surveys performed at the shorelines of IR Sites #1 and #2 and include the entire area of IR Site# 32.

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Specific Comments: (cont.)

4. Page 8-2, “Radiological Material” section 8.3:

First paragraph: Please explain the relationship of the TCRA with the paragraph.

Second paragraph: What is the Navy’s intent by using the MARSSIM guidelines for a Final Status Survey for “areas outside the main disposal area, Area 1a” without discussing the uncertainty of subsurface radiologically impacted waste that may be present outside the main disposal area, such as Areas, 2, 3, 4 and 5?

It is the understanding of CDPH that the areas outside the main disposal area, Area 1, will have restricted use with institutional controls in place. Please explain the Navy’s contradictory use of guidelines that would imply an unrestricted use of the surface soil of a property with institutional controls in place for subsurface soils.

5. Page 9-2, “Alternative S1-4a”:

The description of the alternative is confusing with regard to radiological screening of the Area 1b burn area and Area 1. It suggests that the entire 3.7 acres of Area 1b will be subject to excavation and conflicts with the Navy selected remedy S6-4 that describes “one location in Area 1b” to be excavated for radiologically impacted wastes.

In addition, Alternative S1-4a does not provide additional detail of post excavation activities such as filling the excavated area with clean fill material, compaction of the fill material and the addition of a 4-foot-thick soil cover over the excavated area. Please clarify these issues.

6. Page 9-3, “Alternative S2-3 – Pavement Maintenance and ICs”:

This alternative describes the former concrete runways as “at least 4 feet thick”, but this alternative does not include remedies addressing the asphalt areas adjacent to the former runways other than pavement maintenance and institutional controls (ICs). While there is a focus on the shielding properties of the much thicker concrete runway, the much thinner, less protective and more vulnerable asphalt paved areas adjacent to the runways will be subject to an increased

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Specific Comments (cont.)

frequency of maintenance and possible demolition of selected areas. Such asphalt pavement maintenance could result in additional radiological surveys and MPPEH surface sweeps to be addressed in related ICs.

Therefore, CDPH requests additional information addressing the radiologically less protective asphalt paved areas and what will be done to supplement the institutional controls when asphalt paved areas are subject to indefinite maintenance.

7. Figure D-1 and Specific Comments 5 (for Area 1) and 6 for (Area 2) above:

According to Figure D-1, it is noted that a portion of Area 2a intersects Area 1a. Since the Navy selected remedy for Area 1 is a 4-foot-thick soil cover (and ICs), will the section of Area 2a that intersects the affected portion of Area 1a be covered with 4 feet of soil? If so, will the whole of Area 2a fail the criteria specified in the S2-3 remedy?

Please clarify the relationship between the Area 1 soil cover and Area 2a.

8. Page 9-5, "Alternative S3-4":

Please refer to General Comment # 4 and provide related clarification.

9. Page 9-6, "Alternative S4-4":

Will Area 4 be under the 4-foot soil cover for Area 1a?

10. Page 9-8, "Alternative S5-5":

Please provide an explanation for separating the IR Site# 1 shoreline into 3 distinct and disconnected areas. Will the 4-foot soil cover in Area 1b extent into San Francisco Bay? How will rip-rap throughout the shorelines be covered?

11. Page 10-13, Section 10.1.6.8, "State Acceptance":

Please note that the State of California cannot concur with the current draft version of this Record of Decision.