



# California Regional Water Quality Control Board

## San Francisco Bay Region



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Department of the Navy  
Base Realignment and Closure Program Management Office West  
ATTN: Thomas L. Macchiarella  
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**Subject: Comments on the Draft Work Plan, SCAPS Laser Induced Fluorescence Tarry Refinery Waste Investigation, Former Oil Refinery, Alameda Point, Alameda, California**

Dear Mr. Macchiarella:

We reviewed the subject document, dated July 5, 2007, and have the following comments:

### General Comments

- Aboveground Storage Tanks (ASTs) 324 through 328** - This work plan indicates that Former ASTs 324 through 328 are a potential source of petroleum products, whereas the Final Project Plans for Petroleum Corrective Action Areas 3A, 3B, 3C, 5B West, and 13 East (May 9, 2007) indicated these tanks were not used for petroleum storage. Furthermore, these tanks will be removed from CAA 13 and any contamination present near these tanks are to be handled under the CERCLA program at IR Site 13. Please revise all discussion of ASTs 324 through 328 to reflect this change.
- High Detection Limit** – While the SCAPS Laser Induced Fluorescence method is a useful tool for increasing the resolution regarding the extent of tarry refinery waste, the method's high detection limit (> 100 ppm) will only delineate the highest contaminated areas. Please further discuss how the extent of any refinery wastes that exists below the method detection limit will be addressed in the future.
- Extent of contamination** – Figure 4-1 shows the proposed sampling locations in relation to the area impacted by tarry refinery waste. It shows the impacted area may extend under building 530 to the south of proposed sampling locations. Please indicate what step outs will be taken if SCAPS samples taken at the edge of the site, or adjacent to Building 530, indicate that tarry refinery waste may extend beyond proposed sampling locations. Also provide some discussion of how the extent of tarry refinery waste contamination will be delineated beneath Building 530.

### Specific Comments

- Figure 3-1 and Attachment, Figure 2-2**– Please label what contaminants are associated with the plumes presented in these figures.

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2. **Figure 3-2 and Attachment A, Figure 3-2** – This Conceptual Site Hydrogeologic Model figure for the southern portion of Alameda Point shows that a layer of seawater within the artificial fill sits on top of the fresh water in the first water bearing zone. This thin layer of sea water is not known to exist above the first water bearing zone at these inland IR Sites. Please revise this figure to reflect the hydrogeology at these IR Sites.

Please contact me at (510) 622-2355 or email [ersimon@waterboards.ca.gov](mailto:ersimon@waterboards.ca.gov) if you have any questions.

Sincerely,



Erich Simon  
Project Manager

CC (via US Mail and email):

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