



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

AR_N00236_003082
ALAMEDA POINT
SSIC NO. 5090.3.A

5090
Ser 06.CA\0531
May 17, 2001

Mr. Abid Loan, P.E.
Foster Wheeler Environmental Corporation
2550 Greenwood Avenue
Monterey Park, CA 91755

Dear Mr. Loan:

Subj: PRE-DRAFT FOCUSED REMEDIAL INVESTIGATION WORK PLAN, ORDNANCE AND EXPLOSIVES CHARACTERIZATION, AND GEOTECHNICAL AND SEISMIC EVALUATIONS AT INSTALLATION RESTORATION 1, ALAMEDA POINT, ALAMEDA, CALIFORNIA

This letter transmits Navy comments on the above-reference document. General comments are presented first, followed by specific comments. Specific comments are referenced to Section number, page number, paragraph, and sentence.

General Comments:

Please incorporate tables and figures into the text, immediately following the page upon which first referenced.

Please label tables as n-m, where n is the section number, and m is the sequential number of the table or figure. For instance, current Figure 1 would be identified as Figure 1-1.

Please provide SOPs for drilling, geotechnical sampling, geotechnical testing, and seismic evaluation.

Specific Comments:

EXECUTIVE SUMMARY

Page i, Paragraph 1, Sentence 8: Verify that "Range Rule" is on hold, or has it been abandoned?

Page i, Paragraph 2, Sentence 2: NAS Alameda borders Site 1 on the east and south.

Page ii, Paragraph 4, Sentence 2: Delete "and groundwater".

1.0 INTRODUCTION

1.1 Purpose and Objectives

Page 1-1, Paragraph 1, Sentence 1: Insert "if present" after "...OE contamination..."

1.1.3 Task 2A

Page 1-2, Paragraph 1, Sentence 2: "RA" under CERCLA stands for Remedial Action. Please replace "RA" with Removal Action, here and in sentence 1 of Section 1.2.

1.1.4 Task 4

The results of the OE characterization, geotechnical, and seismic evaluations will be presented in the OU-3 RI Report Addendum, Volume III. Please revise text to reflect title of document.

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1.2.2 Geotechnical Evaluation

Page 1-4, Paragraph 4: Please indicate how long groundwater will be allowed to recover from drilling before depths to groundwater are measured.

Page 1-4, Paragraph 5, Sentence 1: Indicate that the results of the geotechnical exploration and testing will be reported in the RI Report Addendum, Volume III.

1.2.3 Seismic Evaluation

Page 1-4, Paragraph 2, Sentence 5: Replace “test” with “testing”.

1.2.4 Document Preparation

Page 1-5, Paragraph 2, Sentence 2: Revise sentence to indicate that the Focused RI Work Plan, RI Report Addendum, Volume III, and FS Report Attachment will require internal draft (Pre-Draft), Draft, Draft Final, and Final versions. The SHSP will require draft and final versions.

2.0 SITE DESCRIPTION

2.2 Waste Disposal History

Page 2-1, Paragraph 1, Sentence 1: Insert “the” between “...trenches to...” and “...water table...”

2.3 Pistol Range

Page 2-2, Paragraph 1, Sentence 1: Insert “.” after “...archival information” Delete “and”, capitalize “additional”, creating a new sentence.

Page 2-2, Paragraph 1, Sentence 3: Insert “spent” between “... and the...” and “...projectiles were...”

2.5.1 Emergency Removal Action

Page 2-2, Paragraph 1, Sentence 2: Spell out Emergency Removal Action instead of using “ERA”.

2.5.2 Soil Investigation

Page 2-3, Paragraph 1, Sentence 1: Delete the word “Action”.

2.5.3 Surface Search

Approximately eight acres were covered by the Surface Search. Clarify this point in the text.

2.6.1 IR Site 1 Area of Concern

Page 2-3, Paragraph 1, Sentence 2: Rephrase this sentence. Intrusive survey/search for OE will not occur at Site 1.

3.0 PROJECT MANAGEMENT

Page 3-1, Paragraph 1, Sentence 1: Will the project management team also be responsible for technical and administrative aspects of the OE survey, geotechnical characterization, and seismic evaluation?

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3.1.1.1 Project Manager

Page 3-1, Paragraph 1, Sentence 3: Insert "Focused" between "...of the..." and "...RI Work Plan..."

Page 3-3 Contacts: Call this Table 3-1.

Ms. Melita Orpilla is the Contract Specialist, Mr. Richard Selby is the Contracting Officer.

Insert Environmental Protection Agency before California DTSC.

Correct FWENC Program Quality Control Manager to agree with delegation presented in Appendix A.

Delete U.S. Fish and Wildlife (USFWS) contact from the list. USFWS is not actively involved at Site 1.

3.4 Project Deliverables

Page 3-5, Paragraph 1, Sentence 1: Replace "RA" with "removal".

Modify list of deliverables to indicate that RI Work Plan, RI Report Addendum, Volume III, and FS Report Attachment will include internal draft, draft, final draft, and final versions.

Note that meeting minutes will be prepared for internal meetings, not BCT or other public meetings.

3.5 Management of Field operations

Page 3-5, Paragraph 1, Sentence 1: Replace "RA" with "removal".

3.5.3 Traffic Control/Parking

Nesting areas are not a major concern at Site 1. The proposed use of the site is as part of a golf course.

4.0 PROJECT EXECUTION

4.1.2 Pre-Mobilization Conference

Page 4-1, Paragraph 1, Sentence 1: Does the phrase "former NAS Alameda personnel" refer to individuals who used to work at NAS Alameda or people who are currently working at former NAS Alameda?

4.1.3 Mobilization of Equipment and Personnel

Page 4-1, Paragraph 1, Sentence 1: Insert "Focused" between "...of the..." and "...RI Work Plan..."

The "IR site corners" do not exist. California State Plane Coordinates, Zone 3, do exist in the GIS system.

4.2 Surveying and Site Control

Page 4-3, Paragraph 1, Sentence 2: replace "...surface OE removal" with "... surface OE survey with removal, if needed".

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4.3 Exclusion Zone

Page 4-3, Paragraph 1, Sentence 2: There is no intrusive investigation planned for Site 1.

Page 4-3, Paragraph 1, Sentence 3: Replace "Once" with "If".

4.2.3 Communications

Does the use of cell phones and/or radio communications present the potential for accidental detonation of OE?

4.2.4 Bathymetric Survey

The upland topographic survey will not be performed. City of Alameda topographic data will be used. The horizontal location of the shoreline will be surveyed.

Page 4-5, Second Bullet item on page: Will bay floor topographic anomalies be surveyed in detail?

Page 4-5, First full paragraph: There are no docks or piers present at Site 1. How close to the site must the recording tide gauge be placed?

4.2.5 Topographic Survey

As noted above, there will be no topographic survey performed as part of this project. The City of Alameda will perform the topographic survey before the end of June 2001. The data will be made available to the Navy. The upland survey will be to determine the horizontal location of the shoreline along the northern and western sides of Site 1.

4.3 OE Characterization/Removal Action

Page 4-6, Paragraph 1, Sentence 2: All of Alameda Point is currently using the California State Plane Coordinate System, Zone 3. Is the Cartesian Coordinate system described a local system, or will it be the State Plane Coordinates?

Page 4-4, Paragraph 1, Sentence 3: This sentence is incomplete.

4.4 Geotechnical Investigation

Page 4-8, Paragraph 2, Sentence 4: Replace "for" with "during the focused".

Page 4-8, Paragraph 2, Sentence 5: Soil boring and test pit locations are not shown on Figure 5.

4.5.1 Soil Boring Activities

Page 4-9, Paragraph 2, seventh bullet item: Does state or county code require that cement-bentonite grout be used to seal exploratory bore holes? If so, revise borehole abandonment procedure.

Page 4-9, Paragraph 3, Sentence 4: Delete open parens at beginning of sentence; correct spelling of slough.

Page 4-9, Paragraph 4, fourth bullet item: Note that Munsell Soil Color Charts will be used to define the soil color.

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4.5.2 Test Pit Activities

Page 4-10, Paragraph 1, Sentence 1: Note that if any test pits are placed in former landfill cells, the apparent depth of cover is two feet, not four feet.

Page 4-11, third bullet item: Note that Munsell Soil Color Charts will be used to define the soil color.

Page 4-11, last bullet item: Replace “should” with “will”.

4.5.3 Sampling Procedures

Page 4-11, Paragraph 1, Sentence 1: Insert “the” between “...specified in...” and “preceding...”

4.5.5.1 Sample Identification

Page 4-13: There are four specific sample identifiers listed. However, the examples presented consist of five sample identifier components. Please clarify.

4.5.6.2 Field Logbooks

Page 4-14, Paragraph 1, Sentence 2: Replace “initializing” with “initialing”.

4.5.7 Geotechnical Testing

Page 4-15, Paragraph 1, Sentence 1: Replace “the table below” with “Table 4-1”.

Page 4-15, Paragraph 2, Sentence 1: Replace “following table” with “Table 4-1”, also label table as Table 4-1 and add title.

4.5.8 Seismic Field Evaluation

Page 4-16, Paragraph 1, Sentence 4: The statement that “For planning purposes, it is anticipated that...” is unacceptable. This document is the planning document. The number of cone penetrometer testing locations required to provide the data necessary for the seismic hazard evaluation should be clearly stated here.

5.0 REGULATORY FRAMEWORK

5.1 Regulatory Approach

Page 5-1, Paragraph 1, Sentence 1: Delete “UXO and”.

5.2 Applicable or Relevant and Appropriate Requirements

Page 5-2, Paragraph 3, Sentence 1: Replace “necessary” with “appropriate”.

5.3.2 Location-Specific ARARs

Note that Site 1 is not now nor is it proposed to become a National Wildlife Refuge. There are no wetlands, or listed and sensitive species at Site 1. Site 1 is about two-thirds of a mile from the least tern nesting area.

Page 5-4: Other Federal/California ARARs/TBCs

Second bullet item: The text is incomplete.

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5.4 Regulatory Agency Notification

Page 5-4, Paragraph 1, Second bullet item: The USFWS is not a regulatory agency for Site 1.

Page 5-5, Seventh bullet item: BRAC is not a regulatory agency.

6.0 ENVIRONMENTAL PROTECTION PLAN

Page 6-1, Paragraph 1: IR Site 1 is OU-3 at Alameda Point; IR Site 2 is OU-4A. IR Site 2 is at the southwestern corner of Alameda Point, and is not adjacent to Site 1. Is Section the Environmental Protection Plan or the Comprehensive Conservation Plan as stated in Section 6.1?

6.1 Introduction

Page 6-1, Paragraph 1, Sentence 1, Is the reference to NEPA appropriate for CERCLA sites?

Page 6-1, Paragraph 3: The disturbance of natural resources at Site 1 need not be addressed. As mentioned above, the site will become part of a golf course.

6.2 Environmental Issues and Concerns

Pages 6-1 and 6-2: The least tern nesting area is southeast of Site 1. Discussion of the plants and animals present at Site 2 in the Site 1 Work Plan is not appropriate. Neither Site 1 nor Site 2 are presently within a Wildlife Refuge, although the proposed use for Site 2 is as a refuge. The discussions presented in Section 6.2 and its subsections do not seem to be applicable to or appropriate for Site 1. Please revise this section with the future use of Site 1 considered.

7.0 WASTE MANAGEMENT PLAN

Page 7-1, Paragraph 1, Sentence 1: Delete "necessary"; place "disposal of" before "characterization", instead of after.

Page 7-1, Paragraph 1, Sentence 3: Replace "store" with "stored".

7.1 Regulatory Requirements

Page 7-2, Paragraph 1, Sentence 4: Replace "Sites" with "Site".

Page 7-2, Paragraph 1, Sentence 5: Replace "those" with "the".

7.2 Project Waste Descriptions

Page 7-2, Paragraph 1, Bullet item 4: What is being decontaminated? There is no mention of decon anywhere else in the document. If decon is needed, please add to appropriate discussion(s). If no decon is required, delete from this section.

7.4.1 Waste Characterization/Classification

Page 7-2, Paragraph 1 (continued from Page 7-2), Sentence 1: Replace "if" with "of".

7.4.2 Hazardous Waste Management

Page 7-3, Paragraph 1, Bullet item 1: The scope of work is not a component of the Work Plan. Present the analytical testing requirements.

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7.4.3 Waste Containerization and Storage

Page 7-4, Paragraph 2, Sentence 1: Replace “former NAS Alameda personnel” with “Environmental Compliance Manager”.

7.4.4 Wastewater and Waste Fluids

Page 7-5, Paragraph 2, Sentence 1: Delete “When possible,”; capitalize “waste”. Delete the second sentence. Equipment maintenance wastes will not be stored on-site.

7.5 Training/Certification Requirements

Page 7-7, Paragraph 1 (continued from Page 7-6): add sentence indicating that copies of all applicable training certificates for Foster Wheeler and subcontractor personnel will be kept on-site during the course of all activities.

7.7.1 Documentation

Page 7-7, Paragraph 1, Last Bullet item: Explain how the waste profile sheets, LDR certification(s), hazard waste manifest(s), trip tickets or bills of lading, and copies of any state or local permits or approvals will be incorporated into the bound field notebook.

8.0 COMMUNITY RELATIONS ACTIVITY

8.1 Public Information

Page 8-1, Paragraph 1, Sentence 2: Insert “Focused” between “This” and “RI”.

Page 8-1, Paragraph 1, Sentence 3. The Administrative Record for Alameda Point is located at SWDIV Naval Facilities Engineering Command, 1220 Pacific Highway, San Diego, California.

Figure 1: Correct the boundary for Site 1.

Figure 2: Correct the boundary for Site 1.

Figure 3: The BEC is Mike McClelland, P.E. The RPM is Rick Weissenborn, P.E.

Figure 5: Correct the boundary for Site 1.

Figure 6: Correct the boundary for Site 1. The northern boundary of Site 1 is the northern shoreline. Geotechnical information is required for this area, too.

Appendix A, Project Contractor Quality Control Plan

1.0 INTRODUCTION

1.1 Purpose

Page 1-1, Paragraph 3, Sentence 1: Insert “OE removal, if necessary,” between “...characterization,” and “...and geotechnical...”

1.2 Scope

Page 1-1, Paragraph 1, Sentence 2: Insert “Focused” between “...with the...” and “...Remedial Investigation...”

3.0 SUBMITTALS

Page 3-1, Paragraph 1: How frequently will the submittal register be provided to the government?

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3.1 Submittal Descriptions

Page 3-2, SD-03, Second item: Replace "required" with "requires".

4.0 TESTING

If this section addresses testing other than chemical sampling and analysis, why is Section 4.4.2 included?

Figure 1: The BEC is Mike McClelland, P.E. The RPM is Rick Weissenborn, P.E.

Appendix B, Standard Operating Procedures

2.0 PERSONNEL REQUIREMENTS

Page 3-1, Paragraph 2, Sentence 2: Replace "IR" with "RI".

4.0 OPERATIONAL CONSIDERATIONS

4.1 Notification, Scheduling, and Coordination

Page 4-1, Paragraph 1: Remove U.S. Fish and Wildlife Service from the Coordination Meeting list; remove U.S. Fish and Wildlife Service from Notifications list.

4.3 Equipment/Material Requirements

Page 4-2, Paragraph 1, Sentence 1: Define Disposal Supervisor, a new position in this document; bullet item 1: replace "IR" with "RI".

I have not yet received comments on the basewide health and safety plan and the site specific health and safety plan. These comments will be forwarded upon receipt.

Please feel free to contact me at (619) 532-0952, if you have any questions.

Sincerely,



RICHARD C. WEISSENBORN, P.E.
Remedial Project Manager
By direction of the Commander