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NFD POINT MOLATE
SSIC NO. 5090.3.A

July 17, 2003

Commander

Attn: Mr. Duane Rollefson (Code 06CM.DR)
Southwest Division, Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Subject: *Draft enclosures proposed as Revision One to the Postclosure
Maintenance and Monitoring Plan (PMP) for the Site 1, Naval Fuel
Depot, Point Molate, Facility No. 07-CR-0042*

Dear Sir:

Thank you for the opportunity and extended deadline of July 18, 2003 to review the two draft enclosures proposed as Revision One to the current long-term Postclosure Maintenance and Monitoring Plan (PMP) for the Site 1 former landfill at the Naval Fuel Depot (NFD) Point Molate.

Contra Costa Environmental Health, as the Local Enforcement Agency (LEA), reviewed the following: (1) The Oil Water Separator (OWS) PMP; (2) Emergency Contact Information; (3) Appendix A: Revised Elements of the Site 1 Landfill, Figure 4, Tables 1 & 2 and Form 2 from the PMP, and (4) The Ellis Corporation Coalescing OWS Instruction and Operation Manual.

The LEA has provided the following comments for your review.

1. Page 4 of the OWS PMP Annual Inspection and Maintenance did not include the tank to be drained to allow thorough inspection of the interior for cracks, pinholes and softspots in the interior coating. (See pages 9 & 10 under the Manufacturer's Specifications). Please include this as part of the annual inspection and maintenance.
2. Page 5 of the OWS Sampling and Reporting Requirements states that an "...amendment to the previous basewide groundwater monitoring program sampling and analysis plan (SAP)" will be provided. Has a timeframe been established for submittal of this amendment consistent with the current SAP?



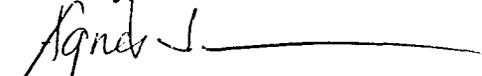
3. Review of the Final PMP, Appendix D provides a Cost Opinion for the maintenance and monitoring of Site 1 Landfill Point Molate. However, no amendment was provided to adjust for maintenance and monitoring of the OWS. The Cost Opinion must include the OWS.
4. Appendix A. (Figure 4) Although the underground seep collection drain, seep collection pipeline and the OWS are emphasized in this diagram, the Revised Figure 4, Site 1 Definable Features does not clearly indicate other details that were clearly visible in the Final PMP (i.e. monitoring wells, soil gas monitoring wells, passive gas vents, groundwater monitoring wells, the northern section of the landfill, etc.) Please provide a map that includes the underground seep collection drain, seep collection pipeline, OWS and those clearly defined details provided in the Final PMP version.
5. Form 1 (Revision 1) Points of Contact. Mr. Fong is no longer with the California Integrated Waste Management Board. Mr. Scott Humpert has now been assigned to this site. Please contact the California Integrated Waste Management Board for his contact information.
6. Page 5 of the Instruction & Operating Manual indicates under equipment "Storage" that "Covering is required for outdoor installation." The OWS unit is currently located outside without recommended covering. The LEA strongly recommends installation of outdoor covering to protect the unit from inclement weather.

Additional notes:

- Sludge generated from the OWS was not addressed. The sludge must be properly stored, transported and disposed of by and to a state licensed hauler and disposal facility.

Should you have any questions regarding any of the above comments, please contact me at (925) 646-5225, extension 225.

Sincerely,



Agnes T. Vinluan, REHS
Senior Environmental Health Specialist

Cc: Adriana Constantinescu, California Regional Water Quality Control Board
San Francisco Bay Region
Scott Humpert, California Integrated Waste Management Board
John Kowalczyk, Remedial Project Manager, BRAC Operations,
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