California Regional Water Quality Control Board
San Francisco Bay Region

Terry Tamminen
Secretary for Environmental Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
http://www.swrcb.ca.gov/rwqcb2

Arnold Schwarzenegger
Governor

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NFD POINT MOLATE
SSIC NO. 5090.3.A

Date FEB 11 2004
File No. 2119.1057 (AVC)

Southwest Division
Naval Facilities Engineering Command
Attn: Mr. Michael Bloom
BRAC Environmental Coordinator
1230 Columbia Street, Suite 1100
San Diego, CA 92101

Subject: Comments on the "Draft Feasibility Study for Installation Restoration Site 1, Naval Fuel Depot Point Molate, Richmond, California," prepared by Sullivan Consulting Group.

Dear Mr. Bloom:

Thank you for the "*Draft Feasibility Study (FS) for Installation Restoration (IR) Site 1, Naval Fuel Depot Point Molate Richmond, California,*" prepared by Sullivan Consulting Group and received by the San Francisco Bay Regional Water Quality Control Board (Water Board) on November 17, 2004. This FS summarizes environmental concerns, presents and evaluates remedial action alternatives, and recommends an alternative for remedial action for waste disposal area known as IR Site 1. This FS is performed as a predecessor to a record of decision (ROD), which will legally certify that all actions are completed at Site 1 and implement institutional controls (IC), if necessary.

General Comment

Water Board staff concurs with the selection of Alternative 3 as a remedial action because promote overall protection of human health and the environment by preventing exposure to waste disposed of beneath the landfill cover through protection of the existing landfill cap and engineering controls.

Specific Comments

Water Board's staff comments on the draft FS are tabulated below:

Comments No.	Water Board's Staff Comments
1. Section 2.3: *Nature and Extent of Contamination*	The description of the waste deposited at Site 1 former landfill, should include in the waste charcterization the following materials: creosote treated wood and burn wood, asphalt empty

	rusted drum (burning barrel?) as they had been presented in the "Final Phase II RI Report" (Tetra Tech, 2000, plates 4 through 9).
2. Section 3.1: *Potential Exposure Pathways Assessment and the Development of Conceptual Site Model*	In the site conceptual model (SCM) section, please present the distance between the toe of the landfill and the freshwater wetlands and the location of the seeps with water contaminated with products or chemicals related to Site 1 landfill. This section should also include a description of the hydrogelogical conditions between the former landfill and the wetlands. Water Board staff recommends Figure 3 attached to this draft FS to present the location of the downgradient wetlands.
3. Section 4.2: *Alternative 2 – Maintenance and Monitoring of the Landfill and Institutional Control*	Last paragraph on page 15 is stating: "*If analysis of groundwater samples shows that TPH compounds are not detected for four consecutive sampling events or if these chemicals continue to be below action levels after the sixth year, monitoring of groundwater at Site 1 is no longer recommended (Tetra Tech, 2002).*" Water Board staff considers that this recommendation is not relevant to the FS or ROD, because each document is a different step in the CERCLA process. Further evaluation of the groundwater monitoring results will follow the requirements of CCR Title 27 for post-closure groundwater monitoring. As it was mentioned on page 10 of this draft FS "*the final determination of ARARs will be made by the Navy in the ROD, as part of the remedial selection process.*" Water Board staff considers that the release from postclosure maintenance will occur according to Section 21900 of CCR Title 27 that states: "*The operator of a solid waste landfill may be released from postclusure after a minimum period of thirty (30) years upon demonstration to and approval by the CIWMB, the EA, and the RWQCB that the solid waste landfill no longer poses a threat to the public health and safety and the environment.*"
4. Figure 4: Site Conceptual Model	The following note from this figure is not consistent with the narrative description of the SCM, presented on page 9 or with the site conditions, i.e., "*Surface water is not evaluated, because no freshwater bodies (other than the wetlands, which are fed by the seep) are located near the areas investigated.* "
5. Section 4.2: *Alternative 2*	The list of potential state action-specific ARARs for the post closure care should include in addition to the three sections already mentioned on the third bullet, the following sections: § 21190 (d), (e), (f), and (g) to be consistent with the restriction listed on page 17, under the subtitle "*Nointerferences with*

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	cover." Same comment is applicable to section 4.2.2 from Appendix A.
6. Appendix A, Section 2.1.1.2: *State ARARs*	(a). The Water Board staff does not agree with the exclusion of Chapter 3 of the Basin Plan on the explanation presented on Appendix C, page C-2, i.e., "*there is not surface water on Site 1, and no surface water actions for Site 1 are required under CERCLA or evaluated in this FS. Further, the discharge from the oil and water separator into the wetlands is not a discharge to surface water as define in the Basin Plan.*" This comment is not consistent with the description of the wetlands presented in Section 3.1, page 9: "*Given the above assumptions, there is only one primary pathway of concern in the Site 1 landfill area: exposure to contaminants in several freshwater wetlands that are positioned downgradient of the toe of the landfill.*" (b). Water Board staff does not agree with the four comments from pages C-4 and C-5 regarding the reason presented for the exclusion of additional ARARs, like: "groundwater monitoring is performed under the base-wide groundwater monitoring program and the ARARs were evaluated in the AM." This draft FS presents two alternatives involving groundwater and methane gas monitoring that is why is relevant to have the additional ARARs presented in this document.

Don't hesitate to call me at (510) 622-2353 or E-mail to avc@rb2.swrcb.ca.gov if you would like to discuss this letter or any other issues relating to NFD Point Molate clean up.

Sincerely,

A Constantinescu

Adriana Constantinescu, RG
Project Manager – Point Molate

cc: Mr. Duane Rollefson, RPM
Mr. Rod Satre, City of Richmond
Mr. Don Gosney, Community Chairperson, Point Molate RAB

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