RESPONSE TO AGENCY COMMENTS ON THE RECORD OF DECISION FOR INSTALLATION RESTORATION SITE 1 NAVAL FUEL DEPOT POINT MOLATE, RICHMOND, CALIFORNIA

This document presents the Navy's responses to the California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) comments on the "Record of Decision for Installation Restoration Site 1 at Naval Fuel Depot Point Molate, Richmond, California" dated December 2004 (hereinafter referred to as the ROD).

RESPONSES TO RWQCB COMMENTS (COMMENTS PROVIDED BY ADRIANA CONSTANTINESCU, RG, PROJECT MANAGER)

Adriana Constantinescu of RWQCB submitted the following comments in a letter dated March 1, 2004 to Mr. Michael Bloom, BRAC Environmental Coordinator of the Navy.

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1. Comment: **<u>Section 1.4 Selected Remedy:</u> This section does not include the following components as outlined in the EPA guidance ("A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents", 1999): a description of how the action fits into the overall site management plan (given that Site 1 is one of the 4 sites at NFD Point Molate), the intended sequence and timing of the remedial actions at Point Molate, and the identification of the selected performance standard.**

Response: The planned action and schedule for Site 1 has been developed independently of the plans for Point Molate's other installation restoration sites. The strategies and schedules for all IR sites at Point Molate are included in the NFD Point Molate Environmental Closeout Strategy/Schedules Book that is updated annually. This document was updated and distributed to RWQCB in February 2005.

A description of the selected performance standard for Site 1 is presented in detail in section 2.7 rather than in Section 1.4.

The only change proposed for Section 1.4 is to include the following text:

"The remedial action objectives (RAO) are discussed in detail in Section 2.7. Numerical RAOs are presented in Table 1."

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2. Comment: **<u>Section 1.6 Record of Decision Certification Checklist:</u> In the certification checklist please include page numbers indicating where the listed information can be found in the ROD to become a "road map" to key information, as suggested in the EPA guidance.**

Response: Section 1.6 will be modified as follows:

"The following information is included in this ROD:

- Chemicals of concern and their concentrations (Section 2.6.1, page 10)
- Baseline risk represented by the chemicals of concern (Section 2.6, page 9)
- Action levels established for the chemicals of concern and the basis for these levels (Section 2.7, page 13)
- How source materials that constitute principal threats are addressed (Section 2.8.3, page 15)
- Current and reasonably anticipated future land-use assumptions considered by the baseline risk assessment and this ROD (Section 2.5, page 9)
- Potential land use that will be available at the site as a result of the selected remedy (Section 2.5, page 9)
- Estimated capital, total operation and maintenance, total and current worth costs, discount rate, and the number of years over which the costs of the remedy are projected (Section 2.9.5, page 19)
- Key factors that led to selecting the remedy (Section 2.9, page 16)

Additional information can be found in the Administrative Record for this site; Appendix A provides an index of the Administrative Record for Site 1."

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3. Comment: **<u>Authorizing Signature, page 3:</u> Please include the middle initial H. on the name of the executive officer. Please delete the rank II after the name of the executive officer.**

The authorizing signature line for the San Francisco Bay Regional Water Quality Control Board will be revised to state: "Bruce H. Wolfe, Executive Officer".

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4. Comment: **<u>Section 2.1.2: Lead and Support Agencies:</u> Please add that the Navy is the lead agency for this ROD and for the cleanup at NFD Point Molate.**

Response: Section 2.1.2 will be modified as follows:

"The lead agency responsible for the remediation at Site 1 is the Navy. The state agency with lead regulatory oversight is the RWQCB."

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5. Comment: **<u>Section 2.2 Site History and Enforcement Activities:</u> The statement "no enforcement activities have been conducted at NFD Point Molate" is not accurate. Water Board issued enforcement documents as Site Cleanup Requirements Order #97-124 and Time Schedule Order #97-125.**

Response: The following paragraph will be added after the second paragraph of Section 2.2:

"RWQCB issued enforcement documents in the form of Site Cleanup Requirements Order Number 97-124 and Time Schedule Order Number 97-125. These orders required the completion of semi-annual groundwater monitoring reports, an EE/CA (or corrective action plan) for Site 1, an RI workplan and report, and a contingency plan to prevent discharge of landfill fuel contaminants to San Francisco Bay."

The following paragraph will be added to the end of Section 2.2:

"The Navy has fulfilled all requirements within the RWQCB's enforcement orders. In addition, the Navy has completed the design and construction of the landfill soil cover and drainage controls, collected groundwater and soil gas samples through the basewide groundwater monitoring program, and evaluated the final remedial action for Site 1 in the FS and this ROD."

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6. Comment: **<u>Section 2.3 Site Characterization:</u> On page 7, on the first paragraph describing the engineering control at NFD Point Molate Site 1, please include the Groundwater monitoring wells used to assess the up-gradient/down gradient groundwater and leachate quality.**

Response: The second paragraph of Section 2.3 will be revised as follows:

"Engineering controls at NFD Point Molate Site 1 consist of:

- A soil cover
- Five groundwater monitoring wells (BR02-18, MW02-06R, MW02-15, MW02-21, MW02-22)
- Four venting wells (GV02-01, GV02-02, GV02-03, and GV02-04)
- Three soil-gas wells (SG02-05, SG02-06, SG02-07)
- A seep collection drain
- An OWS

These site characteristics are presented in Figure 3. Additional site characteristics, including site geology and hydrogeology and the Site Conceptual Model (SCM), are discussed in the following sections."

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7. Comment: **<u>Section 2.6.1.4 OWS Effluent:</u> On the table presenting the OWS effluent sampling results, please present on a separate column the action levels for the constituents of concern.**

Response: The table in Section 2.6.1.4 will be revised as follows:

Analyte	Numerical Remedial Action Objectives (µg/L)	OWS Effluent Results (µg/L)			
		July 2003	October 2003	January 2004	April 2004
Diesel Range Organics	640	**950**	630	**730**	550
Motor Oil Range Organics	640	90 J	480 U	480 U	100 J
Gasoline Range Organics	443	320	130	50 U	50 U
Ethylbenzene	845	31	20	0.5 U	0.7
Xylene	318	78	32	1 J	2

Notes:

J Estimated

U Non-detect

Bold text indicates values above the remedial action objective.

8 Comment: **<u>Section 2.8.2 Summary of Alternative 2:</u> On page 15, on the last paragraph of this section, please clarify what method will be used to provide notice of the institutional control at the site to the future owners.**

Response: The Navy provides the following information to clarify the manner in which future property owners will receive notification of institutional controls.

The institutional controls placed on IR Site 1 will be in the form of deed restrictions and notices. These run with the land and follow the chain of title as property is transferred.

9 Comment: **<u>Section 2.11.3 Five Year Review Requirements:</u> For clarification, please add that the CCR Title 27 criteria will also be considered in the evaluation of post-closure groundwater monitoring frequency.**

Response: The Navy provides the following information to clarify the approach to evaluating remedy effectiveness and the post closure groundwater monitoring frequency.

The ARARs for IR Site 1, including CCR Title 27, as described in the ROD, were used to formulate RAOs which in turn were used to determine the selected protective remedy. The Navy will review the effectiveness of this remedy at IR Site 1 and analyze the progress toward meeting RAOs. This may take place at a five year review or at an earlier time, based upon site conditions and new data. It is the progress towards meeting RAOs which will ultimately determine any adjustment to our remedy, including frequency of groundwater monitoring.

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TO: Mr. Charles De Pew, Code 02R1.RF Contracting Officer Naval Facilities Engineering Command Southwest Division 1230 Columbia Street, Suite 1100 San Diego, CA 92101-8517	DATE: 06/08/05 ACCOUNT NUMBER: B041-204 LOCATION: Naval Fuel Depot Point Molate Richmond, CA

FROM: Harry F. Cullen

Harry F. Cullen, Director of Quality

DOCUMENT TITLE AND DATE:

Response to Agency Comments on the Record of Decision for Installation Restoration Site 1

Comments submitted in a letter dated March 1, 2004 from Adriana Constantinescu of RWQCB

TYPE: ☐ **Contractual Deliverable** ☒ **Technical Deliverable** ***(DT)*** ☐ **Proposal** ☐ **Other**

VERSION: **NA**	REVISION #: **NA**

ADMIN RECORD *(Navy deliverables only)*: **Yes** ☒ **No** ☐ | CONFIDENTIAL: ☐ **Yes** ☒ **No**

SCHEDULED DELIVERY DATE: **06/08/05** ACTUAL DELIVERY DATE: **06/08/05**

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