

Alameda Point Restoration Advisory Board OU-1 Focus Group

C/O Lea Loizos, 833 Market Street, Suite 1107, San Francisco, CA 94103

May 14, 2004

Glenna M. Clark
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

RE: Draft OU-1 Remedial Investigation Report, Sites 6, 7, 8, and 16, Alameda Point, Alameda, CA

Dear Ms. Clark:

On behalf of the community members of the Restoration Advisory Board, the OU-1 focus group is submitting the following comments on the *Draft OU-1 Remedial Investigation Report, Sites 6, 7, 8, and 16, Alameda Point, Alameda, CA*, dated February 13, 2004. We would like to thank you and your contractors for taking the time to attend our focus group meeting and for the detailed presentation that was prepared. It is our hope that we can continue to hold these productive meetings in the future whenever a major decision document is out for review. It is this type of meeting that truly enables meaningful community input and we appreciate your willingness to participate.

Having reviewed the document and the comments sent by the regulating agencies, we have the following comments and concerns:

General Comments

1. Background –
 - a. We have concerns regarding the data set that was used to establish background levels of metals at Alameda Point. Specifically, it appears as though many of the samples taken to establish background levels were taken within IR Sites. According to Figure 3-2, nearly 10 percent of the total data set came from Sites 6 and 16 alone. Have the regulating agencies approved of these background levels? Please provide an explanation of how the sites were chosen for the background study and what assurances we have that these data are truly representative of background.
 - b. There are several references made to “ambient” levels of polynuclear aromatic hydrocarbons (PAHs) in the document (e.g., Section 4.5.2.1, page 4-33). The community has never agreed to an ambient level of PAHs, nor have the regulating agencies to the best of our knowledge. PAHs are not naturally

occurring in the environment, as they are generally created through human activity. Therefore, we believe that levels of PAHs should never be considered as ambient and that levels should be reduced to a 1×10^{-6} carcinogenic risk level according to the planned reuse. Please remove any such references from the document.

2. Human Health Risk Assessment –
 - a. All sites found to have a carcinogenic risk above 1×10^{-6} or a non-carcinogenic hazard quotient above 1 should be carried forward to a Feasibility Study to allow community input on an appropriate remedy for the site.
 - b. It is unclear why only a portion of the available data set was used in the risk assessment. Please explain how data collected before the RI does not meet the data quality objectives for this investigation. We concur with the regulators that all available data for these sites should be used in the risk assessment.
 - c. Risks from soil and groundwater should be added together and not looked at separately.
 - d. According to Section G.5.2, page 10, “Given the scarcity of Bay-area residential land, projected redevelopment reuse at Alameda Point is not likely to include land-intensive pathways, such as residential gardening. Therefore, exposures from hypothetical, future homegrown produce are considered to be incomplete at Sites 6, 7, 8, and 16, and the consumption of homegrown produce pathway was not evaluated.” We disagree with this statement. All of the sites included in this RI are slated for residential or mixed re-use in the redevelopment plan, meaning residences are possible at all sites. It is inappropriate at this time to make assumptions about the availability of land for gardening in these areas. The health risks associated with the consumption of homegrown produce at these sites needs to be included in the risk assessments.
 - e. Please explain why dermal contact with groundwater and inhalation of vapors in a trench are not considered complete exposure pathways for a construction worker.
3. Please include a table of the specific data quality objectives for this investigation in the document.
4. It is difficult to understand the path of the storm sewer lines from the text without having an associated figure. Please include a figure that shows the storm sewer lines from each site and their discharge points.
5. The comparison of risk from ingestion of groundwater at an IR Site to risk from ingestion of East Bay MUD water seems potentially inappropriate. What is the purpose of the comparison? What is the Navy trying to achieve with this comparison?

Site-specific Comments

Site 6

1. The groundwater plume of VOCs at Site 6 is not well defined. The plume boundaries need to be better defined before a remedy can be determined. How and when does the Navy plan to gain better plume definition? Will more wells be installed?
2. According to Section 4.1.4, page 4-6, “The magnitude and direction of the vertical component of groundwater flow between the FWBZ [first water bearing zone] and the SWBZ [second water bearing zone] at Site 6 could not be estimated since no wells are screened in SWBZ.” However, the document then states, “VOCs in groundwater at Site 6 appear to be confined to the upper FWBZ based on the absence of VOCs detected in groundwater samples collected in the SWBZ.” (Section 4.5.1, page 4-32) Please clarify whether or not there are wells screened in the SWBZ of Site 6, and if so, identify the wells and where the data taken from these wells can be found.
3. We agree with the recommendation that groundwater be further evaluated in a feasibility study. We disagree, however, that soils at Site 6 require no further action. The statement “Carcinogenic risk from metals in soil in the central area of Alameda Point (pink background area) is $1.1E-05$ (...), which is greater than the total residential site risk for surface and subsurface soil; therefore, risk from site-related activities is considered minimal.” (Section 4.5.2.1, page 4-33) is inappropriate. The risk calculated for site 6 in the human health risk assessment should provide the *incremental* cancer risk from Navy-related activities. PAHs are one of the main risk drivers in soil and the RAB does not agree that levels of PAHs can be attributed to background. Therefore, we believe that soils should be evaluated further in a feasibility study.
Furthermore, the risks from soil and groundwater should be looked at together. All of Site 6 should be looked at in a feasibility study.

Site 7

1. We have concerns about a former auto hobby shop in Site 7, separate from building 459, that is not mentioned in the document. Community RAB member Jean Sweeney remembers taking an auto repair course at the auto shop and reported seeing unkempt conditions, including roadways with broken asphalt that have since been repaved. Although the exact location of the auto hobby shop is unknown, it is reported to have been in the area north of GAP 30 and south of building 408. According to the Environmental Baseline Survey from June 2001 and Figures 5-4-5-6, no sampling has occurred in this area. We are requesting that the Navy research the history of an auto hobby shop in this area to determine its former location and whether or not sampling is required in that area.

2. There is insufficient information about the corrective action area and how it relates to the OU-1 RI. For example, a figure showing the location of the TPH and MTBE plumes in relation to those being evaluated under the CERCLA program would be very useful. With the information currently provided, it is unclear if there is any overlap of the two areas.
3. The soil debris area does not appear to be adequately bound to the east. A visual inspection is not sufficient; samples should be taken to determine levels of metals in soil east of the current boundary.
4. The separation of the soil debris area makes it difficult to understand the risks posed by soils on the site. The risk from PAHs in soil outside of the debris area was calculated above $1E-06$. We do not agree that these concentrations can be considered background. Therefore, all soil in Site 7 should be included in the feasibility study.
5. We disagree with the recommendations for this site. We believe that both soil (both within and outside of the soil debris area) and groundwater should be carried forward to the feasibility study stage.

Site 8

1. Please explain the following statement: “Although the detection limits for TCE exceed the Region 9 residential PRG of $0.028 \mu\text{g/L}$ (EPA 2002a), the detection limits were within the detection limits acceptable for the method” (page 6-23).
2. It is unclear why groundwater is recommended for no further action when the “risk from benzene alone is $2.2E-05$ ” (page 6-33). If the benzene will be remediated under the TPH program, this needs to be explained in the conclusions and recommendations. We believe that groundwater should be looked at in the feasibility study.

Site 16

1. Although chemicals are identified that could pose a risk to ecological receptors, the document states that there is little likelihood that the site will be used for ecological habitat. Due to the proximity to Breakwater Beach, we are not convinced that there is no pathway for exposure to ecological receptors. We do not agree with the recommendation for no action for chemicals that pose a risk to the ecological receptors.
2. We are concerned about the levels of lead in soil and groundwater. A discussion about the source for lead contamination in the soil should be included. Considering the levels of lead found in groundwater, we are not yet convinced that levels of lead in soil are not a concern.
3. Actions taken to reduce the levels of PCBs in Site 16 soils in 1997 were interim and the remaining carcinogenic risk from Aroclor 1260 in soil is greater than $1E-06$.

Therefore, we believe Site 16 soil should be carried forward to the Feasibility Study before the decision is made that no further action is due.

4. The sources of all contamination, in both soil and groundwater, need to be more thoroughly analyzed before decisions about remedial actions can be made.

Minor Comments

Section 3.3.3, page 3-7: Please include a sentence in this section that directs readers to the site-specific sections for more information about the TPH investigations that are ongoing on these sites.

Section 3.3.4, page 3-8: Please provide an explanation of a GAP (generator accumulation point) in this section.

The OU-1 Focus Group appreciates the opportunity to review and comment on this document. We would also like to thank you for granting us an extension on the comment deadline in order to allow adequate time for review of the document. If you would like to discuss our comments further, please contact me at lealoizos@mindspring.com or Jean Sweeney at jean_sweeney@juno.comT.

Regards,

Lea Loizos
Arc Ecology

Cc (electronic): Anna-Marie Cook, U.S. Environmental Protection Agency, Region 9
Marcia Liao, California Department of Toxic Substances Control
Judy Huang, Regional Water Quality Control Board
Peter Russel, Northgate Environmental
Jean Sweeney, RAB Community Co-Chair