

# Alameda Point Restoration Advisory Board OU-5 Focus Group

c/o Lea Loizos, 833 Market Street, San Francisco, CA 94103  
Phone: 415-495-1786 Email: lealoizos@mindspring.com

November 3, 2004

Thomas Macchiarella  
BRAC Operations, Code 06A.TM  
Department of the Navy, Southwest Division  
Naval Facilities Engineering Command  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101

**RE: Draft Final Groundwater Remedial Investigation/Feasibility Study Report,  
Alameda Point Site 25 and Alameda Annex IR-02, Alameda Point, Alameda,  
California**

Dear Mr. Machiarella:

The OU-5 Focus Group, has reviewed the *Draft Final Groundwater Remedial Investigation/Feasibility Study Report for Alameda Point Site 25 and Alameda Annex IR-02*, dated September 2004, as well as the response to our comments on the draft report. For the most part, many of the issues we brought up in the draft report have been addressed in the draft final, including a more thorough evaluation of the pump and treat remedy. We are also pleased to see a contingency soil vapor extraction (SVE) system added to the biosparging remedy. However, we have a few questions and concerns that have not yet been addressed. Although the document is now final, we are submitting the following comments; we expect that these issues will be addressed before any final remedial decisions are made.

**General Comments**

1. The area covered by the groundwater plume as defined by the Navy in the RI/FS is insufficient. The Navy must acknowledge that the plume continues off Navy property to the east and onto the College of Alameda property. Sampling of off-site areas must be included in the remediation plans to adequately determine the extent of contamination in this direction and to ensure proper protection of human health.

**Groundwater Volatilization and Indoor Vapor Intrusion**

2. We are not yet convinced that the risk to residents and other site users from the volatilization of volatile organic compounds (VOCs) into indoor air is acceptable. For example, there is insufficient explanation provided for the significant detections of MTBE in soil gas. Although concentrations of MTBE in groundwater have been low

and infrequent, the presence of MTBE in soil gas remains a concern, particularly given the detection of MTBE in North Housing during the U.S. Coast Guard's indoor air sampling event. The *Residential Risk Evaluation for U.S. Coast Guard Housing (August 2002 Report)* claims that all VOCs detected within the homes are due to household products and/or are consistent with ambient air concentrations detected by the California Air Resources Board. This theory is not convincing for contaminants such as MTBE and 1-2, DCA with which there are no common household sources associated and that have previously been detected in soil gas. We believe that monitoring of indoor air and soil gas for all VOCs should continue until remediation of groundwater at the site is complete. The risks from all detected VOCs should be evaluated in the risk assessments for soil gas and indoor air.

3. There are contradictions within the report as to whether or not there is a correlation between the groundwater contamination and soil gas detections (see Section 3.2, page 3-12 and Section 4.1.7, page 4-16). Although the highest detections of VOCs in soil gas may not have always directly correlated with those in the groundwater, it is counterintuitive to assume that the detections in soil gas are from another source. In the future, we ask that the Navy accurately portray the potential for volatilization from the groundwater to soil gas unless a stronger, well-founded argument can be made otherwise.

#### **Definition of Plume Boundaries**

4. We agree with the Navy that the plume centers and boundaries, particularly at the east and west edges, need to be more accurately defined prior to remedial action. The report states that additional characterization will occur as part of the Basewide Groundwater Monitoring program and that additional wells will be installed for this purpose. Please clarify for the RAB when the new wells will be installed and in what quarter will we start to see results of this sampling.

#### **Human Health Risk Assessment**

5. We believe the risk assessment should be revised to include the risks from all detected VOCs, regardless of the frequency of detection. Furthermore, the most recent slope factor and unit risk value for naphthalene adopted by the Office of Environmental Health Hazard Assessment should be used in future risk assessments.

#### **Remedial Action Objectives**

6. We are very pleased that the State MCL for benzene has been identified as the remedial action objective (RAO) for groundwater. New information continues to emerge about the carcinogenicity of naphthalene; we expect that the RAO for naphthalene in both groundwater and indoor air will be revised to meet new goals developed by California Department of Health Services. Furthermore, we expect that sampling for the full suite of VOCs in soil gas will be conducted during treatment to ensure protection of residents and other site users; this would address our concern about the detections of other VOCs in soil gas (MTBE, 1,2-DCA, TCE, etc.) and the high organic composition of the soils in this area. It should be noted that any

technology that increases volatilization might volatilize chemicals other than those detected in the groundwater.

We appreciate the opportunity to review and comment on this document. We look forward to working with the Navy to develop an appropriate cleanup plan for the groundwater plume at Alameda Point Site 25 and Alameda Annex IR-02. If you have any questions, please contact me at 415-495-1786.

Sincerely,

Lea Loizos for the OU-5 Focus Group

Cc: Anna-Marie Cooke, US EPA  
Judy Huang, Regional Water Quality Control Board  
Marsha Liao, DTSC  
Henry Wong, DTSC  
Peter Russell, Northgate Environmental Management, Inc.  
Jean Sweeney, RAB Community Co-Chair