

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

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

November 16, 2004

RE: Revised Draft Soil Feasibility Study Report, Operable Unit 5, Alameda Point, Alameda, California

Dear Mr. Macchiarella:

The OU-5 focus group of the Alameda Point Restoration Advisory Board (RAB) would like to thank the Navy for the work that was done to revise the soil feasibility study for OU-5 and to address our previous comments and concerns. We have reviewed the *Revised Draft Soil Feasibility Study Report, Operable Unit 5, Alameda Point, Alameda, California*, dated August 13, 2004, and have the following comments to offer:

General Comments

1. As stated in the site description on page 1-5, approximately 40 percent of OU-5 is covered with structures and concrete or asphalt paving. The proposed remedies only address the remaining 60 percent – the “unimproved” or uncovered areas. Therefore, no matter what remedy is chosen, a significant amount of potentially contaminated soil will remain on the property. We have learned from the Coast Guard that redevelopment of their housing area is likely to occur in the next few years. There has been little public discussion about who will pay for the removal or treatment of the remaining soils when they are uncovered during redevelopment. To assume that the Coast Guard or the City of Alameda will absorb these costs is unacceptable. A remedy for OU-5 soil cannot be chosen until an agreement is reached about how these soils will be handled in the future.
2. Page 1-11: In the discussion of pre-Remedial Investigation (RI) site investigations, the report mentions detections of MTBE in soil in the eastern portion of Estuary Park. These detections are not mentioned in the Draft Final Groundwater Feasibility Study for IR-25 and Alameda Annex Site 2. What is the suspected source of the MTBE? What is the spatial relationship of these soil detections to the detections of MTBE in groundwater and soil gas?
3. As noted in our comments on the Draft Final Groundwater RI/FS for IR Site 25 and Alameda Annex Site 2, we remain concerned about a risk from volatilization

of volatile organic compounds (VOCs) into indoor air. Despite the conclusions of the *Residential Risk Evaluation for U.S. Coast Guard Housing (August 2002 Report)*, we would like to echo the request of the Coast Guard that quarterly monitoring of indoor air be conducted, as the analysis to date is insufficient.

4. It is unclear whether the B(a)P equivalent concentrations presented in figures 1-15 through 1-18 depict pre- or post-TCRA conditions. They appear to be showing pre-TCRA soil concentrations. If so, please provide maps that show post-TCRA soil concentrations.

Institutional/Land Use Controls

5. Section 4.3.3.1, page 4-6, states, “Proven LUCs [land use controls] for local environmental problems in the Alameda Point area are environmental restrictions (or deed restrictions) and covenants to restrict the use of property, similar to those selected in the Marsh Crust Remedial Action Plan/Record of Decision”. Please provide greater detail on these proven LUCs. If LUCs of the type being suggested for OU-5 were in fact proven to work, we would not be as concerned with this proposed “remedy”. To the contrary, we are aware of many failed LUCs on hazardous sites in the Bay Area and specifically in the Alameda Point area, such as the restriction against digging wells on residential property and the requirements for proper storage and transport of marsh crust soils during major construction jobs.
6. The evaluation of LUCs in Section 4.3.3.2 estimates that there will be little cost associated with the implementation of LUCs for OU-5 soil. However, several items have not been included in this evaluation. The estimate should include the costs to the City, the State, and the Navy for monitoring and management of the controls. The estimate should also consider the costs associated with redevelopment of the area if PAHs are left in place, including the costs for disposal, special equipment, etc.
7. Section 4.3.3.2, page 4-8: We disagree with the conclusion that “By preventing exposure to the OU-5 contaminants, the protection of human health is achieved at a nominal cost.” for the following reasons:
 - a. As noted in Comment #6, the costs of the ICs are substantially underestimated.
 - b. The feasibility of implementing the types of LUCs proposed in alternative 2 has not been adequately addressed.
 - c. There is no discussion of how the LUCs will be monitored to ensure compliance by future property users. It is if, and only if, the ICs are upheld that human health is protected.

We remain concerned that the proposed ICs are neither implementable nor enforceable and are therefore not confident that human health will be protected under this remedy.

Cleanup Level

8. The RAB recently requested a meeting with the BCT and agency toxicologists to discuss the “human health based preliminary remediation goal” developed and agreed to by the BCT in May 2001. We would like to reiterate this request in writing since a meeting has not yet been organized. Before the RAB can agree to

the BCT-accepted screening level of .62 mg/kg, the following questions need to be answered:

- a. What are the assumptions that went into the EPA Region 9 PRG of .062 mg/kg for residential soil? Are these assumptions similar to the site conditions at OU-5 and Alameda Point, in general? How do they differ?
 - b. How did the BCT decide upon the proposed screening criteria? What site data were used to make this determination?
 - c. What is the dissolvability of the PAHs at these concentrations?
 - d. What is the impact on the Bay of the runoff from PAH contaminated soil?
9. Both the Coast Guard and the RAB requested a cost analysis for achieving the 1×10^{-6} cleanup level, or a .062 mg/kg level. This was not included in the revised draft.

Identification and Screening of Remedial Alternatives

10. The negative impact of long-term monitoring should be included in the evaluation of the land use control alternative. In the evaluation of the monitoring alternative, the report states that long-term monitoring would place a long-term commitment on future property owners and could reduce the value of the property (Section 4.3.4). The same is true for the land use control alternative however this is never mentioned.
11. In the discussion of the implementability of alternative 4 (excavation from 0-4 foot depth in Parcels 181, 182, and 183), the report states, "This alternative is logistically complex because it involves removing the 2 feet of clean fill placed during the TCRA, stockpiling this soil, and excavating to a depth of 4 feet in areas addressed by the TCRA." (Section 5.2, page 5-9). When the Navy decided to conduct the TCRA in 2001, the RAB opposed the 2-foot depth cleanup level and expressed concern that it would become the final remedy. We were assured that the remedy was only temporary. The logistical complexities created by the Navy's decision to only remove the top 2 feet of soil during the TCRA should not be used as an argument against cleanup to greater depths. Please remove this sentence from the analysis.
12. We would like to see an analysis of the feasibility of building a facility on Alameda Point that could be used to treat PAH-contaminated soil ex-situ. Due to the ubiquitous nature of PAHs at Alameda Point, the question of how to remediate these soils will continue to rise. The commonly used method of dig and haul at Alameda Point is costly, thereby creating an argument against cleanup to greater depths. The creation of a semi-permanent facility on site would potentially allow for more extensive cleanups at a fraction of the cost. While we do not want to delay the cleanup of the site any further, we feel this type of evaluation should be added to the draft final FS.

Cost Estimates (Appendix E)

13. A detailed explanation of how the costs are derived is not given. We cannot evaluate the accuracy of the estimates without knowing the parameters that went into the equations. Please provide this information in the draft final document. Also, as a comparison, please provide information on the accuracy of RACER in estimating costs for other projects where used.

14. The cost estimate for institutional controls (ICs) is grossly underestimated.
- a. The estimate only takes into account the Navy's 5-year review costs while the annual costs to the City or other entities responsible for the maintenance and monitoring of the ICs are not included. Annual reporting on institutional controls is required of the transferee, however the costs associated with this reporting are not included. (Please note that in the response to comments, the Navy stated that these costs would be included in the estimate. Page 15 of 53, #6)
 - b. The estimate assumes only ten years of operation and maintenance costs. Operation and maintenance should continue as long as the institutional controls are in place. Please revise the estimate to cover a more realistic timeframe.
 - c. Costs associated with soil disposal during future construction and development have not been considered. Please revise the estimate to include all costs that the City and future property owners can be expected to incur under this remedy.

We thank you for the opportunity to review and comment on this document. We look forward to discussing our comments with you further. If you have any questions, please contact me at 415-495-1786 or by email at lealoizos@mindspring.com.

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
Peter Russell, Northgate Environmental Management, Inc.
Elizabeth Johnson, City of Alameda
Jean Sweeney, RAB Community Co-Chairperson