

# Arc Ecology

*Environment, Economy, Society, & Peace*

August 3, 2004

Mr. Darren Newton  
Department of the Navy  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, CA 92132-5190

**RE: Draft Work Plan for Remedial Investigation at IR Site 30, Alameda Point, Alameda, California**

Dear Mr. Newton:

Arc Ecology has reviewed the *Draft Work Plan for Remedial Investigation at IR Site 30, Alameda Point, Alameda, California*, dated July 2004. We are pleased to see that the Navy is making IR Site 30, the Miller School and Woodstock Child Development Center, a priority in the cleanup program at Alameda Point. We have the following comments to offer on the work plan.

1. We are not convinced that a sufficient amount of soil gas and air quality sampling has occurred at IR Site 30. The majority of soil gas sampling data that has been collected in this area is unusable due to elevated detection limits. Furthermore, much of the usable data is considerably old; it has been 10 years since the air samples were collected in the crawl space of Miller School and groundwater conditions have since changed. According to the Groundwater Remedial Investigation/Feasibility Study for Alameda Point Site 25 and Alameda Annex IR Site 02 dated October 2003, VOC concentrations beneath the school have increased since 1994. Due to the sensitive populations that use the facilities at IR Site 30 and the presence of elevated VOCs in shallow groundwater beneath the site, Arc Ecology urges the Navy to conduct indoor air sampling at both the Miller School and the Woodstock Child Development Center. The Navy is proposing to sample for various soil properties to provide input into the Johnson and Ettinger model, if necessary. Indoor air modeling is insufficient. Indoor air samples should be collected as a comparison to model results.
2. The rationale for sampling of the various analytes at certain depth levels and not others is unclear. For example, why did the Navy decided to only sample 8 of the 24 locations for VOCs at the 0-2 foot depth level? Why are some areas only being sampled for VOCs rather than the full suite of potential contaminants? Considering the current users of the site and the concerns with contaminants in shallow soil, all of the sample locations should be sampled for

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a full suite of contaminants at the 0-2 foot depth level. Please provide more information about how this particular sampling plan was developed.

3. Due to the short break between school sessions, we understand the small window of time during which fieldwork can be conducted. As such, it seems likely that sampling work for the RI will be conducted simultaneously with the time-critical removal activities that are planned for this site. Is there any overlap between the areas to be sampled and the areas targeted for soil removal? In this case, confirmation sampling could potentially double as RI sampling data, if analyzed for a full suite of contaminants. In the interest of saving already limited funds, we hope that the Navy will work to efficiently combine the fieldwork for both projects.
4. There is no mention in the Sampling and Analysis Plan nor the Site Specific Safety and Health Plan (SSHP) of the neighboring community. As with all sampling and remediation work that occurs near residential areas, it is important to ensure sufficient dust and noise control. The SSHP only mentions precautions for personnel regarding construction noise, which can exceed allowable limits when a direct-push sampling or hollow-stem auger rig are in use. What type of information will be provided to the neighboring community prior to the sampling? A summary of the work to be conducted as well as a list of contact people should be provided to all nearby residents who may be affected by this work. There is no mention of dust control during the drilling process. Whether or not dust is an anticipated problem, a plan to prevent dust should be included in the SSHP. Finally, please include a map of the truck route in the SSHP.

Arc Ecology appreciates the opportunity to review and comment on this work plan. Please contact me at 415-495-1786 or at [lealoizos@mindspring.com](mailto:lealoizos@mindspring.com) if you would like to discuss our comments further.

Regards,

Lea Loizos  
Staff Scientist

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