

STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Judy C. Huang)  
MEETING DATE: October 19, 2005

**ITEM:** 5A

**SUBJECT:** ALAMEDA NAVAL AIR STATION SKEET AND TRAP CLUB,  
ALAMEDA NAVAL AIR STATION, ALAMEDA, ALAMEDA COUNTY –  
Rescission of Site Cleanup Requirements

**CHRONOLOGY:** Final Site Cleanup Requirements adopted October 1993

**DISCUSSION:** The Board adopted site cleanup requirements for the skeet range in 1993 requiring the Navy to: (1) cease discharging lead shot into Waters of the State, (2) define the extent of lead pollution in Waters of the State, (3) determine the degree to which the lead is biologically available, (4) develop a remedial action plan to cleanup or manage the lead pollution, and (5) implement the remedial action plan.

In 1993 Alameda Naval Air Station (Station) was identified for closure under the federal Base Realignment and Closure (BRAC) Program. The Station's skeet range was closed soon after the closure announcement.

Under BRAC, the Navy is required to conduct investigations and remediation actions in accordance with the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLA provides the process for the investigation and remediation of the Station and requires cleanup decisions to comply with all applicable, relevant, and appropriate State and Federal requirements.

On July 2004, the Navy submitted the Final Remedial Investigation Report (Final RI) for the skeet range. The Final RI summarized all previous investigations, evaluated potential human health exposure pathways and conducted addition risk evaluations for diving ducks that were identified as the receptors having the highest potential exposure to lead shot at the skeet range.

The Discharger has met all provisions of the Board's 1993 cleanup requirements by closing the skeet range and has conducted a thorough remedial investigation. No further action is required at the site as documented by the July 2004 Final RI.

The Tentative Order (Appendix A) rescinds the existing Site Cleanup Requirements. We have received no comments on this item and expect it to remain uncontested.

**RECOMMEN-  
DATION:** Adoption of the Tentative Order.

Appendix: A. Tentative Order

# **Appendix A**

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

TENTATIVE ORDER

RESCISSION OF SITE CLEANUP REQUIREMENTS (ORDER NO. 93-129) FOR:

ALAMEDA NAVAL AIR STATION  
ALAMEDA NAVAL AIR STATION SKEET AND TRAP CLUB  
ALAMEDA, ALAMEDA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter called the Board), finds that:

1. **Site History:**
  - a. In 1993 Alameda Naval Air Station was identified for closure under the federal Base Realignment and Closure (BRAC) Program. The Skeet Range was closed soon after the closure announcement.
  - b. In 1997, Alameda Naval Air Station was renamed Alameda Point upon its closure.
  - c. In 1999, Alameda Point was added to the Federal Facilities National Priorities List.
2. **Site Location:** The former Alameda Naval Air Station Skeet and Trap Club (Skeet Range), shown on Figure 1, is located near the northwestern corner of Alameda Point, adjacent to Central San Francisco Bay. It consisted of two main shooting ranges that were actively used for approximately 40 years. Usage of the Skeet Range terminated shortly after the closure announcement.
3. **Board Orders:** The Board adopted site cleanup requirements for the Skeet Range on October 20, 1993 (Order No. 93-129) requiring the Navy to:
  - a. Cease discharging lead shot into Waters of the State,
  - b. Define the extent of lead pollution in Waters of the State,
  - c. Determine the degree to which the lead is biologically available,
  - d. Develop a remedial action plan to cleanup or manage the lead pollution, and
  - e. Implement the remedial action plan.
4. **Base Closure Cleanup Oversight Agencies:** Under the BRAC program, the Base Closure Team, comprising representatives from U.S. EPA, Department of Toxic Substances Control (DTSC), and the Board, was tasked with the implementation, overview, and coordination of all environmental programs.
5. **BRAC Closure Cleanup Requirements:** Under BRAC, the Navy is required to conduct investigations and remediation actions in accordance with the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLA provides the process for the investigation and remediation of the former Alameda Naval Air Station and requires cleanup decisions to comply with all applicable, relevant, and appropriate State and Federal requirements.
6. **Summary of CERCLA Investigation and Remediation Activities:**
  - a. In 1994, based upon the results of sediment sampling conducted as part of an overall Ecological Risk Assessment for the former Alameda Naval Air Station, two of the

- sediment samples collected within the Skeet Range study area indicated the presence of lead shot and polycyclic aromatic hydrocarbons (PAHs).
- b. In 1996, as part of the Operable Unit 4 Ecological Risk Assessment, the Navy collected 12 sediment core samples from the Skeet Range area to characterize the vertical extent of the contamination.
  - c. In 1998 the Navy conducted supplemental sampling consisting of 10 additional sediment core samples to further delineate the vertical and lateral distribution of lead shot. Results of the depth distribution analysis showed that the concentration of lead shot generally increases with depth to about 20 cm, with maximum concentration occurring between 4 and 20 cm.
  - d. On February 20, 2000, the Navy submitted an Ecological Risk Assessment for the Skeet Range. The report concluded that based on the lead shot depth distribution, that the sediment is being deposited such that the lead shot is being buried, rendering it unavailable for diving birds. The report further concluded that PAHs found within the study area might not be attributable to historical site operations.
  - e. Later in 2000, Board staff identified several significant areas of concern regarding the conclusion of the Ecological Risk Assessment. Specifically, Board staff disagreed that there are sufficient sediment data to conclude that levels of lead and PAHs in sediments were within the range of ambient concentrations and that there are minimum exposure and risks to diving birds from ingestion of lead shots as stated in the Ecological Risk Assessment.
  - f. In November 2001, the Navy conducted another field investigation to further characterize the spatial extent of lead shot distribution, determine the source of the PAH contamination, and develop sediment deposition rates.
  - g. On July 2004, the Navy submitted the Final Remedial Investigation Report for the Skeet Range. The Final Remedial Investigation Report summarized all previous investigations, evaluated potential human health exposure pathways and conducted addition risk evaluations for diving ducks that were identified as the receptors having the highest potential exposure to lead shot at the Skeet Range.
7. **Basis for Rescission:** The Navy has met all requirements in Order No. 93-129 by closing the Skeet Range and conducting a thorough remedial investigation. No further action is required at the site as documented by the Final Remedial Investigation Report for the Skeet Range (Final RI) dated July 2004. The Final RI followed the CERCLA process and met all substantive requirements of the Site Cleanup Requirements.
  8. **California Environmental Quality Act (CEQA):** This action rescinds an order to enforce the laws and regulations administered by the Board. As such, this action is categorically exempt from the provisions of the CEQA pursuant to Section 15321 of the Resources Agency Guidelines.
  9. **Notification:** The Board has notified the Navy and all interested agencies and persons of its intent under California Water Code Section 13304 to rescind site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.
  10. **Public Hearing:** The Board, at a public meeting, heard and considered all comments pertaining to this discharge.

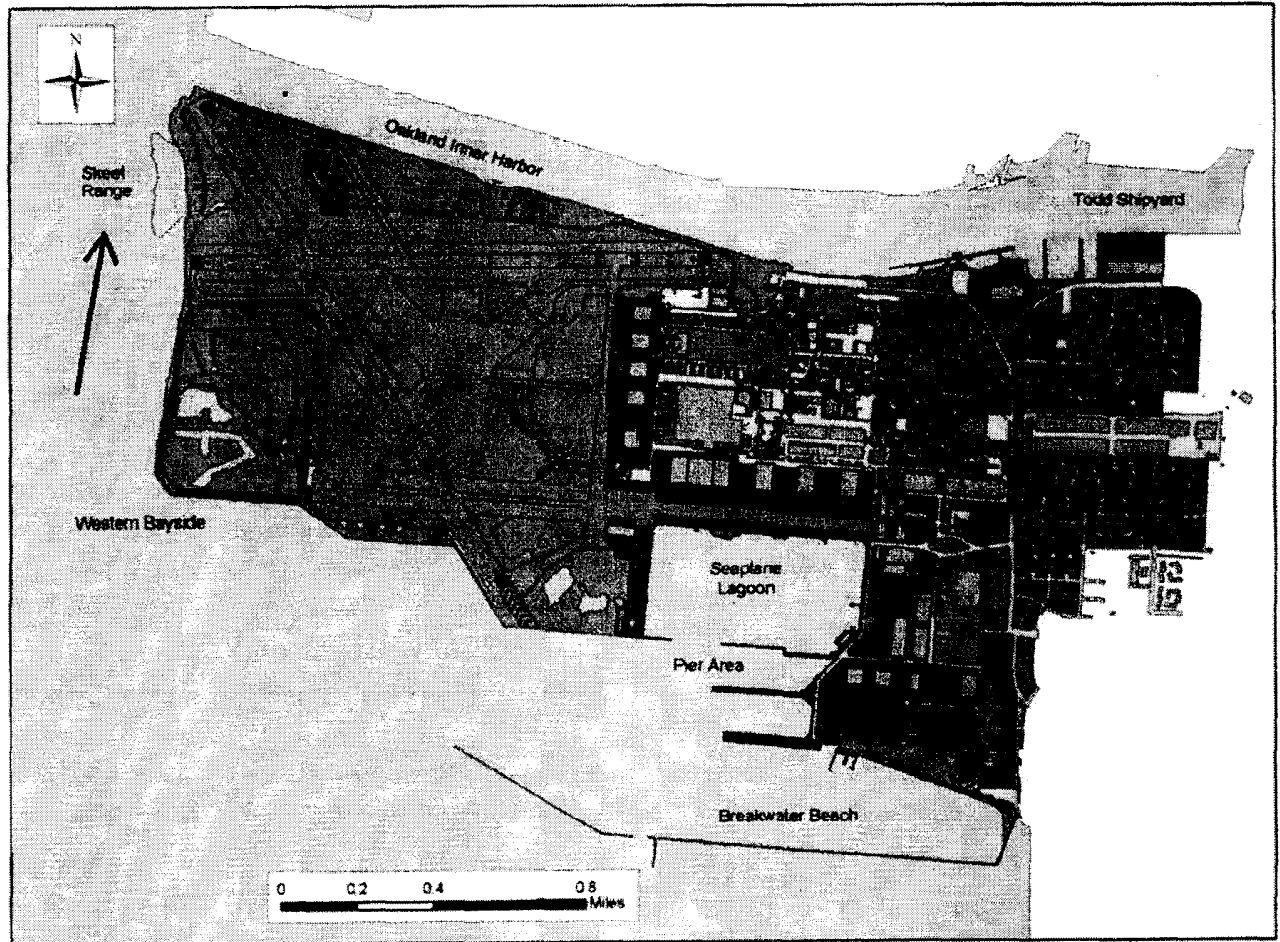
**IT IS HEREBY ORDERED**, pursuant to Section 13304 of the California Water Code, that Order No. 93-129 is rescinded.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on \_\_\_\_\_.

Bruce H. Wolfe  
Executive Officer

Attachment:

Figure 1: Site Map of the Former Alameda Naval Air Station



**Figure 1: Site Map of the Former Alameda Naval Air Station**  
(Skeet Range Identified by Arrow)