

September 22, 2009

CONFIDENTIAL**MEMORANDUM**

To: Alison Harvey, California Tribal Business Alliance

From: Nick Walchuk
Anne Gates
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Subject: Point Molate Draft EIS/EIR

Executive Summary

ENVIRON International Corporation (ENVIRON) reviewed the draft Environmental Impact Statement/Environmental Impact Report (the "draft EIS/EIR") for the former U.S. Naval Fuel Depot at Point Molate (NFD) in Richmond, California (the "NFD," "site," or "facility") on behalf of the California Tribal Business Alliance (CTBA, the "Client"). The objective of our review was to evaluate the presence of hazardous materials and contamination in soil and groundwater at the site, and the potential effects such issues may have on property transfer and site redevelopment, specifically with respect to relevant Department of Interior policy regarding the acquisition of land. Under several of the redevelopment alternatives discussed in the draft EIS/EIR, ownership of the site, after final transfer from the Navy to the City of Richmond (the "City"), will potentially be transferred to the Department of Interior (DOI) - Bureau of Indian Affairs, which will take the site (or portions of the site) into trust on behalf of the Guidiville Band of Pomo Indians of the Guidiville Rancheria (the "Tribe").

ENVIRON draws the following general conclusions based on our review of the draft EIS/EIR and supplemental information. Details regarding ENVIRON's review and analysis are presented in detail in the remainder of the memorandum:

- Soil and groundwater contamination is present beneath many areas of the site, and will require significant remediation and long-term monitoring. Further, additional environmental investigation and characterization is necessary in several areas of the site.
- Existing deed restrictions for certain areas of the site will be replaced by land use controls (LUCs) which may include cleanup goals and objectives that would be difficult to achieve and could limit site redevelopment alternatives. According to the draft EIS/EIR, the LUCs are not yet developed so the effect on the various land use alternatives currently under consideration is unknown.
- The draft EIS/EIR does not clearly describe the timing and nature of the transfer of the site among the various parties involved (e.g. Navy, City, developer, DOI/Tribe) as it relates to the completion of environmental cleanup.
- The draft EIS/EIR does not sufficiently describe the parties responsible for completing current and future environmental investigation and cleanup obligations at the site.
- Because of environmental contamination at the site, DOI policy may preclude acceptance of the site into trust on behalf of the Tribe unless it can be shown that DOI is not ultimately responsible for completing environmental cleanup of the site.

Introduction and Purpose

ENVIRON's analysis is based on a review of the draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) issued by Analytical Environmental Services in July 2009 (the "draft EIS/EIR") and related documentation. It is our understanding that, under several of the redevelopment alternatives discussed in the draft EIS/EIR, ownership of the site, after final transfer from the Navy to the City of Richmond (the "City"), will potentially be transferred to the Department of Interior (DOI) - Bureau of Indian Affairs, which will take the site (or portions of the site) into trust on behalf of the Guidiville Band of Pomo Indians of the Guidiville Rancheria (the "Tribe").

The following memorandum provides a technical evaluation of the draft EIS/EIR, focused specifically on the presence of hazardous materials and contamination in soil and groundwater. The purpose of this evaluation is to determine the potential effects such contamination will have on property transfer and site redevelopment, specifically with respect to relevant DOI policy. According to Part 602(2.6)(E) of the DOI Departmental Manual (Land Acquisition, Exchange, and Disposal), "...real property may be acquired, provided: (1) no evidence of hazardous substance or other environmental liability is found; (2) if there is such evidence, the acquisition will result in insignificant or no increased cost to the United States..."

This memorandum concludes with a set of comments on the draft EIS/EIR relative to issues related to environmental contamination and transfer of the site to the DOI. It is important to note that our comments represent our technical opinions and are in no way intended to represent a legal opinion.

Document Review

ENVIRON has reviewed relevant documents pertaining to the history of the site, including the draft EIS/EIR, previous investigations, and agency correspondence including publicly-available documents obtained from the California State Water Resources Control Board's (SWRCB) "Geotracker" online database and the California Department of Toxic Substances Control (DTSC) "Envirostor" online database. A list of the documents reviewed is provided in Attachment A.

Point Molate Project Background

Site History

Point Molate lands were used by early Native Americans. The land later was part of Rancho San Pablo and was subsequently used as a Chinese fishing camp.¹ The NFD Point Molate site was initially developed in 1907 as a large winery and company town, known as Winehaven. The winery closed circa 1920, and the U.S. Navy purchased the area and developed it for storage and distribution of fuel for the Pacific Fleet in 1942. Naval Fuel Depot (NFD) Point Molate was capable of storing more than 40 million gallons of fuels. While jet fuel and marine diesel were the primary fuels stored, other fuels were also historically stored at the depot, including bunker fuel, aviation gasoline, and some gasoline. Fuel was transferred to and from the facility by off-loading and on-loading ships and barges at the depot fuel pier, as well as through a pipeline transfer station.² Fuel storage and transfer operations at the facility ceased in

¹ *Draft Environmental Due Diligence Summary Report (revised)*, prepared by LFR, dated September 23, 2005.

² NAVFAC Point Molate web page:

https://portal.navfac.navy.mil/portal/page?_pageid=181,4039871&_dad=portal&_schema=PORTAL

May 1995, and operational closure of the facility occurred September 1998. As part of the process through which the Navy transfers land to local government and/or private parties, additional investigation, cleanup, and closure work has taken place at the site since the mid-1990s. Cleanup and closure work at the NFD to date has been carried out by the Navy.

Draft EIS/EIR

The Navy transferred approximately 85% of the site to the City in 2003. The remainder of the site is currently expected to be transferred from the Navy to the City following finalization of the draft EIS/EIR and completion of the associated National Environmental Policy Act (NEPA)/California Environmental Quality Act (CEQA) processes.

As required by the NEPA/CEQA process, a range of reasonable development alternatives are analyzed in the draft EIS/EIR. Four of the six alternatives contemplate mixed-use redevelopment of the site (A through D), and the remaining alternatives (E and F) propose that use of the site will be limited to public park land owned by the City or no action (no change in current use), respectively. Alternatives D through F do not include the transfer of land into federal trust status on behalf of the Tribe; therefore, this review is limited to Alternatives A through C.

Under Alternatives A through C, the site would be transferred from the City to a private developer, which would in turn transfer the site to the DOI. The DOI would hold the site in trust on behalf of the Tribe. The three alternatives include redevelopment of the site to varying degrees, but generally include future land use consisting of a tribal casino, conference center, hotel(s) and other commercial mixed use. Under Alternative B, a small portion of the site would not be transferred into trust, but instead would be owned by the developer and/or Tribe for residential development.

Analysis and Evaluation

Based on the document review described above, ENVIRON evaluated the current status of environmental issues at the site. This evaluation included soil and groundwater quality, ongoing remediation activities, land use restrictions currently in place, proposed future land use restrictions, and potential future environmental obligations relevant to DOI policy.

As discussed in Section 3.12 of the draft EIS/EIR, there are numerous areas of the site where soil and/or groundwater have been impacted by releases of petroleum and/or hazardous substances. The attached Table 1 summarizes these impacted areas as well as the current status of ongoing environmental cleanup and remediation activities in these impacted areas. In addition, Table 1 summarizes the planned future remediation activities (to the degree they have been identified at the time of our document review) for these impacted areas.

Environmental Status

Disposal Areas 1, 2, 4, 6, 7, 8, 9, 11 and 12 (Figure 3.12-2 in the draft EIS/EIR; City-owned parcels)

Based on the presence of contamination at Disposal Areas 1, 4, 6, and 12, additional site investigation/monitoring and characterization associated with prior operation of several large underground storage tanks (USTs) and pipelines is required. Specifically, fuel pipelines remain in place at the site which may require closure if additional investigation suggests releases related specifically to the pipelines, long-term ground water monitoring is required, and residual

contamination may exist at depths greater than 10 feet below ground surface (bgs) in many former and current UST areas. Groundwater contamination also exists near Disposal Areas 4 and 12, which will require remediation and follow-up monitoring after planned soil remediation is completed.

Disposal Areas 3, 5, 10 and 13 (Figure 3.12-2 in the draft EIS/EIR; Navy-owned parcels)

Environmental remediation activities still remain to be completed on these parcels, implementation of which is expected to begin in March 2010. Even after all currently planned remediation activities are completed, numerous environmental issues potentially will remain at Disposal Areas 3, 5, 10, and 13. Most notable are the long-term obligations associated with the former landfill (Disposal Area 10), which include long term operation and maintenance of the landfill cap, performance of routine groundwater monitoring, and implementation of any landfill related corrective action that could be required (e.g. groundwater remediation). In addition, in some cases the extent of environmental contamination has not been fully defined. For example, in Disposal Area 5, the extent of free product petroleum and polyaromatic hydrocarbons in groundwater is currently unknown and therefore requires investigation and delineation.

Selected Agreements Related to Land Transfer

According to the draft EIS/EIR, in 2003, the Navy executed a quitclaim deed to the City for transfer of Disposal Areas 1, 2, 4, 6, 7, 8, 9³, 11 and 12 (see Figure 3.12-2 in the draft EIS/EIR).

According to the draft EIS/EIR, early transfer (i.e. land transfer before remediation is completed) of Disposal Areas 3, 5, 10, and 13 to the City is planned with the remaining remedial obligations to be undertaken by Upstream, prior to transfer to the DOI/Tribe.

Early Transfer Cooperative Agreement (ETCA)

The ETCA between the City and the Navy provides for the conveyance of identified future environmental obligations from the Navy to the City. Funding in the amount of \$28.5 million is to be granted by the Navy to the City for those environmental obligations identified in the ETCA, along with an additional financial contribution (\$5 million) from Upstream and the Tribe. Under the ETCA, the City also assumes the Navy's cleanup responsibilities on the previously transferred parcels (i.e. Disposal Areas 1, 2, 4, 6, 7, 11 and 12).

In addition, the ETCA requires that a cost-cap and pollution liability insurance policy be in place at the time of the transfer of the remaining parcels to the City. According to the draft EIS/EIR, the federal government, the City, Upstream and the Tribe will all be protected from obligations and cost overruns under this policy. The Navy will retain responsibility for any "unknown" previously unidentified contamination that is not covered by the pollution liability insurance policy.

Land Disposition Agreement (LDA)

The LDA outlines the purchase agreement for the land between the City and Upstream, Upstream agrees to accept the City's environmental obligations as defined in the ETCA until transfer of the site to the DOI/Tribe, at which time the City's obligations are passed on to Upstream's successors, i.e. the DOI/Tribe. The LDA specifies that prior to closing, the NEPA/CEQA process shall be completed. The LDA also indicates that at closing, Upstream

³ Disposal Areas 8 and 9 are not part of the property under any of the alternatives in the EIS/EIR that would transfer to the DOI/Tribe.

intends to assign its rights to the Tribe. Lastly, under the LDA, the Tribe waives sovereign immunity and submits to jurisdiction of courts of California and the United States.

Regulatory and Property Status

Deed Restrictions

As a result of the contamination issues, deed restrictions are in place with respect to many of the parcels transferred to the City in 2003, including limitations relating to utility easements, asbestos, soil and groundwater management, etc. At the time of the transfer, the SFRWQCB and the Navy signed a covenant that restricts development within Disposal Areas 1, 2, 6, 11, and 12.

According to the draft EIS/EIR, the 2003 SFRWQCB restrictions are to be replaced by Interim LUCs which are yet to be developed, but according to the draft EIS/EIR, would contain similar provisions as the existing deed restrictions. The intent of the LUCs is to provide the SFRWQCB with a mechanism to lift restriction(s) on future development so long as yet-to-be established cleanup requirements and objectives defined in the LUCs are met. The draft EIS/EIR states that updated LUCs will be in place prior to final transfer of the remaining portions of the site to the City, and well in advance of any land being taken into trust.

SFRWQCB Cleanup Order

The SFRWQCB issued a new cleanup order (Order) in November 12, 2008. However, at a meeting on September 15, 2009, the State Water Resources Control Board (SWRCB) adopted an order vacating the current Order⁴, based on a petition that the cleanup actions and plans described in the Order were not properly evaluated under CEQA. It is unknown if and when a new order will be issued. However, it is likely that the content of a new order would be similar to the rescinded Order, which outlines the specific deliverables and schedule to complete the outstanding evaluations, remediation, monitoring and reporting for the site. In general, the Order does not prescribe specific remedial actions, but provides a general schedule and deadlines for submittal of work plans, implementation, and completion dates of remedial activities. The Order identifies the Navy and the City as the responsible parties (“Dischargers”) for implementing cleanup at the site. In addition, the Order specifically states that the list of Dischargers would be amended if and when the City transfers the land to Upstream and/or Upstream’s successors.

Potential Development and Environmental Issues Relevant to DOI Policy

As stated above and summarized in Table 1, there are numerous potential environmental issues associated with the site, including additional site investigation, characterization, and remediation, along with related long-term obligations.

In order for development of the proposed project to occur under Alternatives A, B, and C, some of the existing land use restrictions would have to be removed. However, since the LUCs have not yet been developed, it is unknown as to whether burdensome cleanup requirements would be imposed by the SFRWQCB to lift restrictions on more sensitive land uses (e.g. residential). The evaluation of the various development alternatives in the draft EIS/EIR is therefore incomplete because the potential limitations of redevelopment that may be included in the LUCs are not considered.

⁴ Information provided via telephone by Ms. Jeanine Townsend, Clerk to the Board, SWRCB.

With regards to the LDA, the agreement that specifies the conditions of transfer between the City, Upstream and Tribe, it appears that Upstream should have satisfied the City's environmental obligations prior to transfer to the DOI/Tribe, but in no instance, is this explicitly stated in the draft EIS/EIR. In fact, Section 2.1.4 of the draft EIS/EIR indicates that transfer of the site into federal trust would occur upon approval by the DOI, following completion of the NEPA process. It is unclear whether environmental remediation activities would have to be completed at the time the site is transferred into federal trust.

The recently rescinded SFRWQCB Order (and presumably future order[s]) names current responsible parties and the basis by which additional responsible parties may be named. Depending upon the nature of the trust, it appears that the DOI could become a responsible party by holding the land in trust on behalf of the Tribe, as the Tribe has waived its right to sovereign immunity. Moreover, it is unclear from the documents reviewed which entity will retain the responsibility for completing long-term environmental obligations (e.g. landfill monitoring and O&M). Since DOI policy prohibits accepting property with hazardous substances or other environmental liability unless there is such evidence that the acquisition will result in insignificant or no increased cost to the United States, it appears that DOI would not be able to take the site into trust until the environmental obligations were satisfied or it was clear that any remaining environmental obligations (such as long term monitoring) were the responsibility of another party such as Upstream or the insurance company.

Draft EIS/EIR Comments

1. Section 2.1.3, Page 2-6, 2nd paragraph: “These new restrictions, which will include many of the existing terms, will be in place prior to final transfer of the land from the Navy to the City, and well in advance of any land being taken into trust.”

The draft EIS/EIR indicates that the transfer of the site from City to Upstream is expected upon completion of the CEQA process, and transfer of land into federal trust is expected upon completion of the NEPA process. However, the NEPA/CEQA processes are being completed concurrently. Will the new land use controls (LUCs) be prepared before finalization of the draft EIS/EIR? Because specific requirements and objectives for lifting restrictions on development will be included in the LUCs, and many of the proposed alternatives for development will rely on the removal of some or all of the restrictions, the LUCs are a key component with regards to any decision to transfer the site to the DOI.

2. Section 2.1.4, Page 2-7, 1st bullet: “The ETCA is a contract between the City and the Navy that provides for transfer of identified future environmental obligations to be transferred from the Navy to the City, funding in the amount of \$28.5 million dollars to be granted by the Navy to the City for those obligations...”

Based on the information provided in the draft EIS/EIR, while there are many specific remedial actions outlined, it appears additional site characterization needs to be completed in some areas of the site. Limited information is presented regarding estimated future environmental costs and the basis of the \$28.5 million to be funded by the Navy for future investigation and remediation. We understand that a cost-cap insurance policy will be obtained to cover cost overruns. Given the significant uncertainty regarding future environmental investigation and remediation at the site, has the viability of obtaining such a policy been evaluated?

3. Section 2.1.4, Page 2-7, 3rd bullet: “A Site Cleanup Order (Order) was adopted by the SFRWQCB on November 12, 2008, which outlines the specific deliverables and schedule to complete the outstanding violations, remediation work, monitoring, and reporting for the site.”

This Order was rescinded by the State Water Resources Control Board on September 15, 2009. Because the draft EIS/EIR and various related agreements (e.g. ETCA) rely on the provisions of the Order, how does the Order’s rescission affect the draft EIS/EIR?

4. Section 2.1.4, Page 2-8, 3rd paragraph: “Transfer of the subject land into federal trust would occur upon approval by the Department of the Interior, following completion of the NEPA process.”

See Comment #1 regarding the timing of the NEPA/CEQA process and land transfers. Additionally, the acceptance of land into federal trust status appears to be in conflict with DOI’s Departmental Manual Part 602 DM 2 (Land Acquisition, Exchange, and Disposal), Section 4, which states that the Department will “...minimize the potential liability of the Department and its Bureaus by acquiring property that is not contaminated unless directed by Congress, a court mandate, or as determined by the Secretary [of Interior].”

Although exceptions provided in the policy allow for acceptance of such land, by taking the

land into trust on behalf of the Tribe, will the DOI also take on the Tribe's potential obligations as a responsible party for remediation of the site? If so, how will DOI resolve the apparent conflict with Part C of the above Manual, which states in part "...real property may be acquired, provided: (1) no evidence of hazardous substance or other environmental liability is found; [and] (2) if there is such evidence, the acquisition will result in insignificant or no increased cost to the United States..."?

5. Section 3.12: Hazards and Hazardous Materials

Potential vapor intrusion concerns related to the presence of volatile organic compounds (VOCs) in shallow soil and groundwater are of increasing significance and have warranted greater agency scrutiny in recent years. While the draft EIS/EIR makes note of potential vapor intrusion issues related to petroleum products and PAHs in the area of the hillside USTs and IR-04, the document fails to address this issue with respect to VOCs, particularly for areas of the site where VOCs are known to be present in soil and/or groundwater.

6. Section 5.2.11-4: "The site-specific Fuel Product Action Levels (FPALS) do not address cleanup levels at or below the groundwater table. The establishment and approval of the cleanup of residual contamination below the groundwater table for all land use scenarios that are protective of human health and the environment will be required through input from the SFRWQCB."

The FPALS do not address cleanup levels for soil below 10 feet below ground surface and are not protective of future site residents. In areas of the site where groundwater may be deeper than 10 feet (i.e. hillside areas), and/or where future residential land use is envisioned, appropriate cleanup goals should also be established.

7. Section 5.2.11-5: "The responsible party shall continue groundwater, landfill, and oil/water separator (OWS) monitoring in accordance with the Post Closure Monitoring Plan..."

The draft EIS/EIR does not identify the responsible party(ies). If the Tribe is the responsible party at the point in time where remediation activities are completed and only long term monitoring of the former landfill area remains, would this in turn entrain the DOI as the primary responsible party? See Comment #4.

8. Mitigation Measures 11-3 through 11-11: These mitigation measures require that certain environmental investigation, remediation and monitoring activities be performed. These mitigation measures do not identify who is the responsible party for implementing these activities. It is critical that the mitigation measures identify a responsible party since for reasons discussed in Comment #4, it is generally contrary to DOI policy to acquire contaminated land or act as a responsible party for remediation (unless it is at no cost to the United States). See Comments #4 and #7.

TABLE

TABLE 1

Recognized Environmental Condition	Installation Restoration (IR) Site	Associated Disposal Area(s)	Transferred to City of Richmond	Current Status	Residual Environmental Issues	Mitigation and Improvement Measures (EIR, Mitigation and Improvement Measures: Hazards and Hazardous Materials [Section 5.2.11])	Unaddressed Environmental Issues and Obligations
Underground Storage Tanks	N/A	1 and 6	Yes	<ul style="list-style-type: none"> 9 out of 20 tanks have regulatory closure Closure requests have been submitted to RWQCB for 2 additional tanks Underground fuel pipelines remain in place in some areas. Groundwater monitoring conducted by Navy on semi-annual basis. 	<ul style="list-style-type: none"> Detected constituent concentrations are compared to fuel product action levels (FPALs) for park maintenance workers and recreational users of the site. No residential use is considered. Contaminated soil exceeding FPALs and considered below the depth for open space use has been left in place. (FPALs are applicable only to soils in the upper 10 feet bgs). 	<ul style="list-style-type: none"> Develop soil and groundwater management plan (SMP) for future ground disturbing activities. Perform confirmation testing for hydrocarbon vapor intrusion concerns for USTs located in areas to be developed for commercial use. Install soil vapor extraction systems if necessary. Land use restrictions preventing residential development and other sensitive uses (i.e., hospitals, schools). 	<ul style="list-style-type: none"> Ongoing remedial and cleanup actions associated with 11 tanks that require regulatory closure. For tank sites that have regulatory closure, additional cleanup may be required depending on selected land use alternative. Underground fuel pipelines remain in place. Additional investigation and potential remediation to address VOC vapor intrusion concerns.
Former Landfill Area	IR-01	10	No	<ul style="list-style-type: none"> 3-foot thick soil cover cap, seep collection system, and drainage controls were constructed in 2001. Oil/water separator constructed in 2002. Hydrocarbon filtration system installed in 2005. Groundwater monitoring conducted by Navy on semi-annual basis. 	<ul style="list-style-type: none"> During 2006 groundwater monitoring event, free product was observed in 2 of 5 monitoring wells. According to the RWQCB containment of groundwater contamination has not yet been demonstrated . 	<ul style="list-style-type: none"> Ongoing groundwater monitoring by responsible party to be identified by the Mitigation Monitoring Program. Operation and maintenance (O&M) of groundwater containment and extraction system by responsible party to be identified by the Program. Land use restrictions to maintain the integrity of the soil cover cap and prohibit residential development. 	<ul style="list-style-type: none"> Identification of responsible party for long term monitoring and O&M activities.
Sandblast Grit Disposal Areas	IR-02	5, 6, and 11	Yes, except Disposal Area 5	<ul style="list-style-type: none"> Excavation of metals-contaminated soil and confirmation sampling conducted in 1997/1998 No further remedial action approved by RWQCB in 1999. 	None. Remedial action completed. According to the 2000 record of decision (ROD), the site is acceptable for unrestricted use.	N/A	N/A
Treatment Ponds Area	IR-03	3	No	<ul style="list-style-type: none"> Subsurface extraction trench and treatment system installed in 1995. Ponds removed from service and contaminated material removed to a depth of 10 feet bgs in 2003. Draft feasibility study (FS) and corrective action plan (CAP) submitted to RWQCB in 2005. Draft CAP proposes excavation of affected soils to depths greater than 10 feet bgs, continued operation of the existing groundwater containment/treatment system, and long-term groundwater monitoring. RWQCB requested development of soil cleanup goals for soils deeper than 10 feet in 2006. 	<ul style="list-style-type: none"> Further investigation required to define extent of fuel product plumes and refine excavation plan. Cleanup goals have not been developed for soils below the groundwater table. Final remedy has not been selected. 	<ul style="list-style-type: none"> Develop SMP to address excavation of affected soils within the former treatment ponds area. Establish cleanup levels that address contamination below 10 feet bgs and/or below the groundwater table for all land use scenarios. Remediation of soils in the areas of the former treatment ponds to remove mobile petroleum fractions in soils. Soils less than 10 feet bgs with concentrations exceeding industrial/commercial levels will be disposed off-site. Soils deeper than 10 feet bgs that contain more mobile fractions of TPH will also be disposed off-site. 	<ul style="list-style-type: none"> Additional investigation required to define the extent of contamination. Select and implement remedial action once cleanup levels are established. Long-term groundwater extraction and monitoring by responsible party to be identified by the Program. Identification of responsible party for long term monitoring activities.

TABLE 1 (continued)

Recognized Environmental Condition	Installation Restoration (IR) Site	Associated Disposal Area(s)	Transferred to City of Richmond	Current Status	Residual Environmental Issues	Mitigation and Improvement Measures (EIR, Mitigation and Improvement Measures: Hazards and Hazardous Materials [Section 5.2.11])	Unaddressed Environmental Issues and Obligations
Northern and Southern Shoreline Areas, Drum Lot 1, Drum Lot 2, Building 87	IR-04	1, 4, 5, 12, and 13	Yes, except Disposal Areas 5 and 13	<ul style="list-style-type: none"> • PAH and VOC-impacted groundwater present beneath Drum Lot 1. The containment was from IR-03 was extended into Northern Shoreline and Drum Lot 1 areas in the 1990s. • TCE plume present beneath the northwestern portion of Drum Lot 2. • Free product and PAHs present in groundwater beneath the Southern Shoreline Area. • In 2008, PCE was detected in soil collected from archaeological excavation areas in the Southern Shoreline Area at levels exceeding the residential ESL. • Soil samples collected at Building 87 have contained pesticides and PAHs. • Groundwater monitoring conducted by the Navy on semi-annual basis. 	<ul style="list-style-type: none"> • PAH and VOC-impacted groundwater beneath Drum Lot 1. • TCE plume in Drum Lot 2. • PCE detected in soil in Southern Shoreline Area at levels exceeding the residential ESL. • Free product and PAHs present in groundwater beneath Southern Shoreline Areas. • PAH and pesticide contaminated soil at Building 87. 	<ul style="list-style-type: none"> • Ongoing groundwater monitoring under the basewide monitoring programs by responsible party to be identified by the Program. • O&M of groundwater containment system in the Northern Shoreline and Drum Lot 1 areas by responsible party to be identified by the Program. • Remediation to remove source of free product at MW-10-23 and PAHs near former VB-1, VB-2, and VB-3 (all located within Southern Shoreline Area). • Removal of the source of TCE at Drum Lot 2. • Excavation and removal of pesticide-contaminated soil adjacent to building 87. • Land use restrictions to prevent potential human health risk during remediation activities. 	<ul style="list-style-type: none"> • Select and implement remedies to address soil and groundwater contamination in IR-04 areas. • Investigation and characterization of potential VOC vapor intrusion concerns.

ATTACHMENT A

References

Documents Reviewed

The Alliance Compliance Group Joint Venture (ACG). *Underground Storage Tank Closure Summary Reports, Former Naval Fuel Depot Point Molate, Richmond, California*. Dated between January and November 2008.

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