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EPA COMMENTS/DRAFT OU-1 RI REPORT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

N00236.000029
ALAMEDA POINT
SSIC NO. 5090.3

April 10, 1998

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL # of pages ► 12

To Mukul Sharma	From Pat McFadden
Dept./Agency Temi	Phone # (650) 244-2520
Fax # (916) 852-0307	Fax #

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

Ms. Patricia McFadden
Remedial Project Manager
EFA WEST 612
900 Commodore Dr.
Bldg. B-208(U)
San Bruno, CA 94066-5006

Subject: Draft OU-1 Remedial Investigation Report, Alameda Point, Alameda, California, dated February 10, 1998

Dear Ms. McFadden,

U.S. EPA staff have reviewed the subject document and find that it does not meet minimum standards for a Draft Remedial Investigation Report, as described in "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" (EPA/540/G-89/004). This document is inadequate with respect to data presentation, site characterization and data analysis, and cannot be used to support the development and screening of remedial alternatives without major revisions.

Please submit a revised Draft OU1 RI Report which addresses the attached general comments. The timeframe for submitting a second draft should be discussed by the Base Closure Team, keeping in mind that EPA expects a 60 day comment period to complete the review of the revised draft, since the poor quality of this document precluded a detailed review of site information. Attached are general comments intended to assist the Navy in removing major deficiencies, allowing for an in-depth review of the second Draft.

If you have further question, please contact Lynn Suer at (415) 744-2396, or Anna-Marie Cook at (415) 744-2367.

Sincerely,

Lynn Suer
Lynn Suer
Remedial Project Manager

Anna-Marie Cook
Anna-Marie Cook
Remedial Project Manager

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL # of pages ► 12

To Teresa Lopez	From Patricia McFadden
Dept./Agency HSI Geotrans	Phone # 650/244-2520
Fax # 303/426-7780	Fax #

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

Attachments
cc: Steve Edde, Alameda Point
Mary Rose Cassa, DTSC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MEMORANDUM

To: Lynn Suer, Ph.D. (SFD-8-2)
Remedial Project Manager

From: Sophia Serda, Ph.D. (SFD-8-B) Sophia Serda Ph.D.
Regional Toxicologist

Subject: Operable Unit 1 (OU1) Remedial Investigation Report, Alameda Point

Date: April 2, 1998

I have completed a cursory review of the Operable Unit 1 (OU1) Remedial Investigation (RI) Report and the Human Health Risk Assessment. I cannot support or recommend the results of this risk assessment be used to make any management decision regarding the status of the OU1 sites. There are many limitation to the risk assessment which include site characterization data gaps, selection of chemical of concern, data validation, and quality assurance issues. The overall quality of this CERCLA document is poor. Also, it is unfortunate for the community of Alameda that the Navy has not considered the possibility of remediation for sites that they have impacted.

General Comments

1. Limitations of the Risk Assessment - Several specific risk assessment calculations contained in the document are inconsistent with the risk assessment methodology EPA Region 9 requires for risk assessments under CERCLA. It should be noted in my original comment letter (1995) on the Risk Assessment work plan and in subsequent meetings we have identified these deficiencies but the Navy has continued to dismiss them. In fact the Navy has also dismissed my State counterpart, Dr. Jim Polisini's concerns.

   The risk assessment results identified in this document as "EPA" are misleading. These numbers represent a departure from the risk assessment policy and practice at every Federal Facility and Superfund site EPA works on in Region 9. Specifically, the Navy proposes a methodology that we find less protective than the methodology that Region 9 has required. It should be noted that the methodology required by EPA is consistent with requirements of the State of California. The only difference between EPA and DTSC risk estimates should be toxicity values for chemicals that have both Federal and State toxicity estimates.

   For the community of Alameda, having 2 risk estimates could be confusing. I recommend that only one risk estimate be calculated, using the methodology approved by both EPA Region 9 and DTSC, with the most health protective toxicity value.

2. Selection of Chemicals of Concern (COCs) - There are not an unwieldy number of chemicals detected at each of the OU1 sites. Therefore I do not support or recommend the use of the 5% frequency of detection criteria or the preliminary remediation goals (PRG) screen to select chemicals of concern (COCs).

3. Statistical Analysis of Background Concentrations to Identify COCs - A qualitative comparison of ranges or the appearance of similarity is not sufficient to deselect chemicals of concern. It is unclear if statistical analysis was performed to identify chemicals of concern as outline in Figure 5-1. Provide the location of the statistical evaluation.

4. Ground Water Pathway - The risk assessment for the ground water pathway is incomplete. The domestic use of groundwater must include ingestion, dermal contact and inhalation.

5. Total Petroleum Hydrocarbon (TPH) Data - CERCLA petroleum exclusion does not apply at sites where contamination is a mixture of petroleum compounds and other chemicals. Identify in the text & table the concentrations of TPH detected.

6. Risk Characterization for Soil - Most of the soil data has been collected from 0-10 feet or to depth of ground water. Risk assessment evaluated 0-2 feet for recreational and residential scenarios. The risk characterization for much of the soil data is absent for most sites. I recommend the risk be evaluated for 0-6 inches, 0-2 feet and 0-10 feet for both the residential and recreational scenario.

7. Exposure Parameters - Some exposure parameters found in Appendix D are different from the work plan.

8. Site 16 - Why submit a risk assessment for Site 16 when a removal action has already taken place?

9. Beryllium Toxicity Values - New beryllium toxicity values.

10. Appendix D Site Description and Data Description - In Appendix D the site description and data description conflict with the text of the RI site characterization.

11. Data Validation- A data validation package was not included with the RI document. Provide the data validation reports & verification that validation was performed on 100 percent of the data with approximately 90 percent of the samples validated at U.S. EPA level IV.

12. Quality Assurance (QA) Issues - It is unclear if the quality assurance project plan (QAPP) was followed. Was there any unusual or unexpected QA issues that arose during the RI sampling activities for OU1?

13 Exclusion of Data From the Risk Assessment - Clarify, for each Site how many samples from the RI data set were excluded from the risk assessment. Also, identify the class of

compounds and when this information will be reviewed and presented to the Agency for discussion. Did the project Team decide which data would be excluded from the risk assessment?

- For example Site 7, at 2 feet in B07A-02 lead was detected at 6,760 mg/kg. This information was not evaluated in the risk assessment found in Appendix D.

- Also, at Site 7, benzene was detected at .5 feet in M07A-08-0 at 3 µg/kg. This information was not used to calculate risk in Appendix D. In fact benzene was not even identified as a COC for 0-2 feet, Table D.73-5.

- At Site 3, soil gas: High hits of benzene, and at 2.5 feet, in M03-04, TPH gasoline was present at 19,700 mg/kg, benzene at 7.5 mg/kg, ethyl benzene at 50 mg/kg, toluene at 210 mg/kg and xylene at 250 mg/kg. This information was not evaluated in the risk assessment. The risk assessment only looked at 0-2 feet.

14. Fish Ingestion Pathway - Identify in the text that the impacts to fish associated with contaminants on-shore are evaluated in the ecological risk assessment portion of the RI and impacts to fish associated with off-shore sediments surrounding Alameda will be addressed in the off-shore RI report by evaluating the contaminant levels detected in the sediments samples. Collection of fish tissues will also be evaluated as part of the off-shore ecological risk assessment.

15. Total Risk - Total risk for each site must be included in the risk characterization. Total Risk= Site-related Risk + Non-site Related Risk. This information is useful to the risk managers and community stakeholders.

16. Radiological Concerns - Include current radiological program information. This should include areas of concern and removal actions.

17. Hot Spots - The data indicates that the contamination is uneven within some of the areas with the most contamination. Clarify, how the data was evaluated to ensure hot spot areas of contamination were identified and the associated risk not overlooked.

18. Environmental Baseline Survey (EBS) Data - The EBS certified laboratory program (CLP) data should be included in the risk assessment.

19. I have discussed my comments with my State counterpart, Dr. Jim Polisini, and he concurs with my recommendations. We both agree that an item by item response to comments without substantial changes to the risk calculation will not be acceptable

If you have any questions regarding my comments I can be reached at (415) 744-2307.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco CA 94105-3901

MEMORANDUM

SUBJECT: Review of draft OU-1 Remedial Investigation Report, Alameda Point, February 10, 1998.

FROM: Ned Black, Ph.D. JNB
Ecologist/Microbiologist
Technical Support Team (SFD-8-B)

TO: Lynn Suer
Remedial Project Manager (SFD-8-2)

DATE: 2 April 1998

I find the ecological risk assessment portions of this report to be largely unacceptable and incomplete. I recommend the report be revised into a second draft (and not a draft final) based on the following comments.

1. Chapter 2. The discussion of background levels of metals is confusing at best. I am aware this topic is being addressed in detail by other reviewers on the Technical Support Team and I endorse their views.

2. Section 5.2.3. Depth of contaminants. There is considerable anecdotal evidence that California ground squirrels dug burrows considerably deeper than 2 feet below ground surface (bgs). If necessary, I can find scientific references to confirm this. Contaminants at least as deep as 5 feet bgs should be included in the ecological risk assessment.

3. Section 5.2.4. The dilution attenuation factor (DAF) is presented entirely without a rational basis or supporting evidence. If a DAF is to be used, it should be based on site and contaminant specific evidence together with a discussion of the chemical and physical phenomena upon which it is based. Furthermore, the use of a DAF is questionable at Alameda Point, considering the large number of storm drains present in the shallow subsurface. All use of the current DAF in Chapter 6 is rejected.

4. Appendix J. This section is much better written than the other ecological risk assessment portions of the report. I agree with the method used to derive toxicity reference values and hazard quotients. As a screening ecological risk assessment (steps 1 and 2 in US EPA 1997), this section is almost acceptable. I am concerned, however, about the potential for bioaccumulation of the contaminants at Site 14, and am not satisfied that Appendix J completely addresses this issue. Furthermore, for burrowing animals such as the ground squirrel, dermal exposure to contaminants such as dioxins and PCBs could be significant and should be included in the

screening model.

I can be reached at 415-744-2354 if you, the Navy, or the Navy's contractors would like to discuss this further.

Reference:

US EPA 1997. Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments, Interim Final. Office of Solid Waste and Emergency Response. EPA 540-R-97-006. June 5.

cc (fax only): James M. Polisini, Ph.D., DTSC HERD
Laurie Sullivan, NOAA CRC
James E. Haas, U.S. Fish & Wildlife Service

MEMORANDUM

Date: 6 April 1998

To: Anna-Marie Cook, RPM
Lynn Suer, RPM

From: Mark Filippini, Hydrogeologist
Technical Support Team (SFD-8-B)

Subject: Review of Draft OU-1 Remedial Investigation Report, Alameda Point

I have reviewed the Draft Remedial Investigation Report for OU-1 dated 10 February 1998. The report was prepared by Tetra Tech EM Inc. for the Department of the Navy. You have asked that I review relevant sections of the RI document with respect to hydrogeology and geology. As part of my evaluation, I have also reviewed the comments on the Basewide Site Description (Chapter 2) of the document prepared by the Geologic Services Unit (GSU) of the California Department of Toxic Substances Control (DTSC). I concur with all of the GSU's comments and have not repeated them here.

General Comments

The objectives of the RI process are to 1) adequately characterize a site to determine if potential environmental risks are posed by specific portions of the site, 2) provide enough characterization to evaluate remediation alternatives for the site, and 3) present the data and evaluations in a manner that is understandable to the public and future users of the site. Based on my review of the document, I do not believe the Navy has met these objectives. In addition, the RI report does not present an adequate conceptual site model for each of the sites. The contaminant sources are not evaluated to enough detail to allow for a proper evaluation of potential remedial alternatives. This RI presupposes that each of the sites will require no further action. For example:

- The Navy has not presented appropriate graphical demonstration of data that was collected at any of the sites. Isocon maps should be presented for all chemicals of concern in both soil and groundwater. This is necessary for the conceptual site model to present the limits and extent of contaminants; the resultant information will be used to evaluate potential remedial alternatives.

- The potential presence of remaining source material at each of the sites and the phases and media these sources may present in (such as NAPL's or contaminant adsorption to soil) should be discussed. No discussion of source areas at each of the sites is presented. A presentation of this information is necessary for the conceptual model and to evaluate a reasonable range of alternatives for selecting remedies.

- The RI does not consider future uses of the sites in its characterizations or evaluation of data requirements for potential remedial actions. Future building and utility installation must be considered when evaluating whether certain levels of contaminants can remain in place. A decision to leave contaminants in place must be weighed against the cost for removal of the contaminants. In many instances, site remediation technologies for shallow contaminants such as petroleum and volatile organics are very economical and timely. Therefore, a decision to leave contaminants in place must be left to the FS process.

- For each of the sites, it should be stated explicitly what the limits and extent of contamination are, what phases they are in (aqueous, NAPL, soil, vapor, etc), and the physical parameters of the formation the contaminants are in. The physical parameters include aquifer characteristics, soil porosity, vapor permeability, and any other characteristics that are necessary to complete remedial evaluations in the feasibility study. This information is not consistently supplied for each site.

- The potential impact of each of the release areas to the Merritt Sand should be evaluated on a site by site basis. The Merritt Sand should be considered a protected water supply. For each of the sites, an evaluation of the potential for existing contamination to impact the Merritt should be quantified. This is especially of concern where DNAPLs are present, where there is a downward vertical groundwater gradient, and/or where the Bay Mud aquitard is not present.

My specific comments below present more details of my concerns.

Specific Comments

Chapter 2 - Section 2.6, Background Chemical Concentration Determination - Land use or exposure based determination of water quality goals for metals is not an acceptable substitute for background values. If statistically meaningful values cannot be determined for the fill aquifer, consideration should be given to using the Merritt formation values since it is a protected water resource potentially impacted by releases from each of the sites.

Chapter 2 - Section 2.7.4.2, Sources of Freshwater - It is unclear how the Navy arrived at the recharge values presented in this Section. The Navy should be able to produce quantitative estimates of impervious coverage and infiltration values. Absent of that information, a conservative estimate of 20% pervious cover and 20% (3.6 inches) of annual rainfall as infiltration was applied to the facility. The resultant recharge was calculated to be 34 million gallons per year. This number should be used instead of the 13.5 million gallons per year provided in the report.

Chapter 5 - Section 5.2.4, Ecological Risk Evaluation - The use of a Dilution Attenuation Factor (DAF) of 10 is not justified or supported. A site specific value must be used for each site and contaminant of concern. It's application at each of the sites renders the conclusions for each site unsupportable.

Chapter 6 - Site Summaries - No specific comments are provided for each of the sites. The general comments provided above apply to each site.

Chapter 7 - Fate and Transport Modelling - The model used was not evaluated for validity and applicability to the site. This reviewer is unfamiliar with the model and cannot comment at this time. However, statements in the assumptions lead me to question the validity of the model. On page 7-3 it is stated that "..very little vadose zone VOC contamination is present at OU-1 sites" and therefore risks associated with volatilization were determined not to be significant. These are not appropriate or substantiated statements. The evaluations of risk should be performed based on actual site data for VOC's in the soil.

The Navy should reformat and resubmit the RI report to address the deficiencies noted above. I hope this presents you with the information you require at this time. If you have any questions or require further information, please contact me at 744-2395.

Attachment to April 10, 1998 U.S. EPA letter

Comments on
Draft OU1 Remedial Investigation
Alameda Point, dated February 10, 1998

by the

United States Environmental Protection Agency

General Comments:

The following comments supplement those provided in attached technical memoranda provided by Dr. Sophia Serda (Human Health Risk Assessment), Dr. Ned Black (Ecological Risk Assessment) and Mark Fillippini (Site Characterization/Hydrogeology).

1. The Navy may choose not to evaluate the residential exposure scenario when residential use is not projected for the site. However, the No Action Alternative cannot, then, be applied to these sites, since a deed restriction constitutes an "action" under CERCLA. This comment applies to Sites 3, 12, 15, 16, 22, and 23.

2. It is surprising and disappointing that the Navy and the Navy contractors have not provided such basic items as conceptual site models, groundwater contaminant plume maps, and maps of soil and soil vapor concentrations. Without these it is nearly impossible to evaluate sources of contamination, migration potential, potential threats to human health and the environment and possible remedial alternatives. The revised draft must include these diagrammatic tools to enable an in-depth review. Refer to the Onshore Remedial Investigation Report for Naval Station Treasure Island (September 1997) for examples of good graphical representations of the data.

3. The potential for contaminated groundwater to migrate to the Bay through storm drains should be incorporated into the conceptual site models and evaluated. Information for Site 18 (Storm Drain System) should be used in characterizing each site, since Site 18 is not contained within any single Operable Unit.

4. The groundwater units seem to be in error by three orders of magnitude in both the text and tables. However, it is unclear whether this is consistently true. As a result it is not possible to review the site-specific data, even qualitatively. The next draft must be accompanied with an electronic copy of the database, so that the agencies can check for accuracy.

5. All groundwater data should be evaluated to characterize temporal and spatial

trends and calculate risk. It is misleading to provide a diagram of only the last quarter of sampling data and base risk calculations on a subset (4 quarters) of groundwater data.

6. It is not appropriate to use building footprints to define sites. There is sufficient information to map sites as defined under CERCLA, based on the extent of contamination.

7. A condensed version of the document titled "Draft Determination of the Beneficial Uses of Groundwater at Alameda Point" is presented in Section 2.7 of this RI. For the most part, this information is irrelevant or misinterprets the regulations and standards with respect to the designation of a potential source of drinking water. According to both Federal and State regulations the shallow aquifer at Alameda Point is a potential source of drinking water with respect to TDS levels and yield.

   The jurisdiction for designating potential sources of drinking water rests with the U.S. EPA and the Regional Water Quality Control Board. The Navy does not have the authority to exempt or de-designate an aquifer, as is implied by the "no action" recommendation for sites with contaminants exceeding MCLs. At a minimum the Navy needs, in writing, a determination on de-designating the aquifer through the RWQCB, similar to the documentation provided to other bases where this determination has been made.

   It is premature for the Navy to decide on no action for the aquifer at NAS Alameda. Until a decision on the status of the aquifer as a potential drinking water source has been made by the regulatory agencies, the Navy will not be able to determine which exposures pathways exist from groundwater, what level of risk is presented by contaminants through each pathway and which sites need to be carried through to the Feasibility Study for evaluation of groundwater remediation.

8. Neither the Federal or State regulations uses MCLs as a basis for designating an aquifer as a potential source of drinking water. MCLs are standards that 1) must be met by the water purveyor as the supply water enters the distributions system, and 2) cannot be exceeded when disposing of any wastewater into an aquifer and 3) standards that the NCP states are used for remediating a drinking water source. Secondary MCLs are irrelevant to any designation, because SMCLs are suggested goals that the water purveyor meet, and are not requirements. These goals may be exceeded, yet the supply water still considered suitable for use. A TDS level of 500 mg/L is exceeded in some public drinking water supplies and in bottled water, and is certainly not a criterion for designation

   The Navy has stated that a TDS level of 500 mg/L is the State's criterion for designating a potential source of drinking water (Section 2.7.1.2). This is an error.

The State's criterion is 3,000 mg/L, pursuant to State Water Resources Control Board Resolution 88-63 and the Regional Board implementation of this criterion (RWQCB Board Order 89-039). The TDS level (500 mg/L) cited by the Navy is a secondary MCL that has been established by the Regional Board for the purpose of regulating high TDS discharges to the Livermore/Amador Valley aquifer, a closed groundwater basin (pp. IV-20 to IV-22 San Francisco Bay Water Quality Control Plan)

9. The Navy has suggested (Section 2.7.3.3) that contamination of the aquifer with chlorinated hydrocarbons constitutes a rationale for de-designating the resource as a potential drinking water source. Documentation of chlorinated hydrocarbon contamination is summarized in Table 2-4 and Figure 2-16. Clearly, this proposal is illogical, as it provides an incentive to contaminate aquifers above MCL levels to insure that cleanup is not required. By presenting this logic and supporting documentation, the Navy and the Navy contractor have revealed a gross misunderstanding of environmental cleanup regulations.

10. The potential impact of each release to the Merritt Sand aquifer should be evaluated on a site by site basis. In the southeastern portion of Alameda Point (underlying much of OU1), the Merritt Sand aquifer meets criteria for a drinking water source, and is particularly vulnerable to contamination, because the Bay Mud aquitard is not present. Contamination of this aquifer is of particular concern where DNAPLs are present and/or where there is a downward vertical groundwater gradient.

11. The calculations for estimating recharge values appear to be based on faulty assumptions regarding the extent of impervious coverage in a realistic future use scenario. These assumptions result in an underestimate of recharge due to precipitation. In addition, overestimates of water usage (1,540 gallons/day/4 persons + 226 gallons/day for lawn watering) greatly underestimate the capacity of the aquifer to supply household water. EBMUD cites an average use of 155 gal/person/day. Recharge rates and aquifer capacity should be re-evaluated based on realistic assumptions.

12. The Navy must provide support for the claim that the freshwater lens beneath the runway area in the western portion of Alameda Point is due to a leaky EBMUD supply line. Supply utility maps showing these lines.

13. The survey of domestic wells in the vicinity of Alameda Point is likely an underestimate of the number of backyard wells in the area. The database maintained by EBMUDs Backflow Prevention Program should be consulted to determine the number and locations of additional wells.

14. The well construction standards referred to in Section 2.7.1.3 and 2.7.1.4 must be supported by citing the appropriate state and county ordinances.

15. Due to the general nature of the ARARs provided in Section, EPA will not provide comments on the ARARs section until specific ARARs are listed as part of the Feasibility Study.

16. The agencies did not agree to dismiss the issue of inorganic background levels for groundwater. Although we acknowledge the complications involved in establishing an approach for determining background, it may be necessary for the Navy to address these complications and develop background levels for groundwater. It is not acceptable to simply state that all metals are due to background for lack of an approach.

17. The fish ingestion and plant ingestion pathways must be considered in evaluating risk to human health, since it is likely that future residences may have vegetable gardens and fishermen will likely utilize the marina area.

18. In calculating human health risk, risk due to inhalation of contaminated groundwater must be considered. Inhalation may occur during construction activities and irrigation when groundwater is used, as well as through gas migration into the soil.

19. Additional field work may be required to complete the characterization of some sites. For example, at Site 3 the extent of groundwater and soil vapor contamination, particularly within utility corridors, has not been defined.

Tetra Tech EM Inc.

10670 White Rock Road, Suite 100 ◆ Rancho Cordova, CA 95670 ◆ (916) 852-8300 ◆ FAX (916) 852-0307

October 16, 2000

Mr. Lou Ocampo, PE
Remedial Project Manager
Naval Facilities Engineering Command
BRAC Operations, Southwest Division
1230 Columbia Street, Suite 1100
San Diego, California 92132-5190

Subject: **Various Correspondence from Regulatory Agencies for inclusion into the Administrative Record for the Fleet and Industrial Supply Center, Oakland Alameda Facility/Alameda Annex, or Alameda Point, Alameda, California CLEAN Contract No. N62474-94-D-7609, Contract Task Order No. 271**

Dear Mr. Ocampo:

Per your request enclosed is one copy of the following correspondence for your files:

- Draft Operable Unit (OU)-1 Remedial Investigation (RI) comments from United States Environmental Protection Agency (EPA), dated ~~April~~ 10, 1998. ~~February~~
- Draft OU-1 RI comments from Department of Toxic Substance Control (DTSC), dated April 15, 1998.
- Revised Draft OU-1 RI comments from DTSC, dated November 3, 1998.
- Revised Draft OU-1 RI comments from EPA, dated November 6, 1998.
- EPA Review of Draft Final Marsh Crust Feasibility Study for Alameda Annex and Alameda Naval Air Station dated February 7, 2000.
- DTSC comments on Draft Final Feasibility Study for the Marsh Crust and Groundwater at the Fleet and Industrial Supply Center, Oakland Alameda Facility/Alameda Annex and for the Marsh Crust and Former Subtidal Area at Alameda Point dated February 7, 2000.
- EPA comments on the Action Memorandum for Marsh Crust Time-Critical Removal Actions at East Housing Area dated March 14, 2000.
- EPA Review of Public Draft Record of Decision/Remedial Action Plan for Marsh Crust and Groundwater at Alameda Annex and Marsh Crust and Former Subtidal Area at Alameda Point dated July 19, 2000.

Six copies of each correspondence have been forwarded to Ms. Dianne Silva for inclusion into the administrative record files at Alameda Facility/Alameda Annex or Alameda Point.

If you have any questions, please call me at (916) 853-4512.

Sincerely,

Mark R. Reisig

Mark R. Reisig
Project Manager

Enclosure

cc: Ms. Diane Silva, Navy Information Repository (3 copies of each)
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TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N62474-94-D-7609 Document Control No. TC . 0271 . 10613

TO: Mr. Richard Selby, Code 02R1
Contracting Officer
Naval Facilities Engineering Command
Southwest Division
1230 Columbia Street, Suite 1100
San Diego, CA 92132-5190

DATE: 10/16/00
CTO: 0271
LOCATION:
Alameda Annex, Alameda

FROM: Greg Swanson
Daniel Chow, Program Manager

DOCUMENT TITLE AND DATE:

Various Correspondence from Regulatory Agencies for inclusion into the Administrative Record for the Fleet and Industrial Supply Center, Oakland Alameda Facility/Alameda Annex, or Alameda Point, Alameda, California. Dated October 16, 2000 (These documents are forwarded to Ms. Diane Silva for inclusion into the Alameda Annex or Alameda Point information repository.)

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