



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

VIA FACSIMILE  
(619) 532-0940

November 1, 2000

Mr. Richard Weissenborn  
EFD Southwest BRAC Offices  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101-8517

Re: Action Memorandum for Time-Critical Removal Action at Clown Park Play Area(OU-5),  
Naval Air Station Alameda

Dear Mr. Weissenborn:

The U.S. Environmental Protection Agency (U.S. EPA) has received and reviewed *Action Memorandum for Time-Critical Removal Action of PAH-Contaminated Soil at the Clown Park Play Area, Alameda Point [ former Alameda Naval Air Station] Alameda, California* (Action Memorandum), dated October 23, 2000. Regarding the initiation of the Remedial Investigation/Feasibility Study (RI/FS) for OU-5, U.S. EPA would like to remind the Navy of U.S. EPA's and Cal-EPA, Department of Toxic Substances Control's (DTSC) mutual concern with the pace of cleanup and interest in having the Navy present its approach, site schedule, and RI Work Plan for OU-5 as soon as possible. U.S. EPA staff look forward to our planned November 7 - 8, site visit and strategy/schedule meetings and subsequent receipt and review of the OU-5 RI Work Plan.

Based upon U.S. EPA's review, we have only minor concerns with the Navy's Action Memorandum. Our concerns are as follows:

General Comment:

1. In several sections of the Action Memorandum where PAH soils data is presented, the Navy does not establish a pattern of discussing PAH contaminant concentrations in terms of benzo[a] pyrene equivalents nor are the differences in total PAH and B[a]P discussed. Text explaining the significance of B[a]P equivalents data is necessary and any discussion of data should be either be adjusted to B[a]P equivalents or clearly identified as non-B[a]P equivalent data (i.e., total PAH).

Specific Comments:

1. Section 1.0, Introduction and Purpose: In the first paragraph, please spell out benzo[a]pyrene and include (B[a]P) in Abbreviations and Acroyms section.

2. Section 1.0: In the second paragraph, please include "RI work plan" to the list of CERCLA documents the Navy will prepare for OU-5/Site 25.
3. Section 2.3, Release or Threatened Release of a Hazardous Substances or Contaminant: The word "fill" is misspelled in the forth sentence of the first paragraph.
4. Section 2.4, National Priorities List Status: Please correct to show that Alameda Naval Air Station was added to the NPL in July 1999.
5. Section 2.5.1, Previous Actions: In the third paragraph, text indicates a PAH concentration range of 0.11 to 560 mg/kg for samples collected between October 1998 and April 1999. Please clarify if the presented range represents total PAH concentrations or B[a]P equivalents.
6. Section 3.1, Threats to Public Health and Welfare: In the first sentence, first paragraph, please clarify if the referenced 6.43 mg/kg concentration represents a total PAH or B[a]P equivalent value.
7. Sections 3.0, 3.1 and 4.0, Endangerment Determination: Please replace phrase, "public health and welfare" with "human health".
8. Section 5.1, Description of Removal Action and 5.4, Project Schedule: In Section 5.1, text indicates field work will be completed by October 31, while in Section 5.4, text indicates the removal action will be completed by November 10, 2000. For clarity, U.S. EPA recommends that the Navy select and present one completion date.
9. Section 6.0, Expected Changes in the Situation Should Action be Delayed or Not Taken: U.S. EPA recommends the Navy change the second sentence to read "Delaying the removal action would also delay construction of a much needed play structure, to be installed by the Coast Guard."

If you have any questions concerning this matter, please do not hesitate to contact me at (415) 744-2365.

Sincerely,

  
Phillip Ramsey  
Remedial Project Manager

cc: see next page

cc: Mr. Michael McClelland, BRAC Environmental Coordinator  
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10/10/00 10:30