



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

N00236.000090
ALAMEDA POINT
SSIC NO. 5090.3

January 18, 2001

Glenna Clark, Code 5090
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

RE: Site 15 Action Memorandum Addendum, Alameda Point

Dear Ms. Clark:

EPA has reviewed the above referenced document, submitted by the Navy to EPA on December 20, 2000. The original Action Memorandum for Site 15 was focused primarily on mitigating the threat posed by lead and PCBs to human health. The Action Memorandum Addendum differs from the original Action Memo in that the primary focus of this follow-on effort is to mitigate the threat posed by the contaminants to ecological receptors, specifically those located adjacent to and within the Oakland Inner Harbor.

Ned Black, EPA's ecologist/microbiologist, has reviewed the proposed cleanup numbers for lead and PCB to determine whether the levels are sufficiently protective for ecological receptors and also to ensure consistency with other regional cleanup activities of a similar nature. Dr. Black concurs with the proposed level of 218 ppm for lead. He does not accept the proposed 1 ppm for PCBs as being adequately protective for ecological receptors, especially in light of the much lower ER-M number set for PCBs and the likelihood that contaminated soil can wash into the adjacent Harbor.

In addition to Dr. Black's concerns, EPA would like to mention a few other items that caught our attention. ARARs were not covered in the Action Memorandum Addendum. A review of the original Action Memo ARARs shows the list to be very general and all-encompassing, so it is difficult to determine which specific ARARs will be applied to this removal action. The Clean Water Act is broadly cited in the original Action Memo and discounted as applicable due to the removal action being focused entirely on soils. Please be aware that this follow-on removal action must adhere to the appropriate Clean Water Act regulations that deal with wetland habitat and also with any impacts to the Oakland Inner Harbor surface water body. Fugitive dust is referenced in the original Action Memo and the Navy must comply not only with State ARARs but also any county standards that have been set that may be more stringent.

Please also be aware that the Off-Site Rule (40 CFR 300.440) applies for all waste disposed of off the base. While this rule was generally not widely acknowledged, or understood, at the time the original Action Memo was drafted, it is now expected that all off-site disposals will be in compliance with this regulation.

As a final comment, it is mentioned in the cost estimate section that costs are based upon the original removal action which occurred in 1994. Would it not be more appropriate to use cost information that is current?

With regard to this follow-on removal action, EPA is primarily concerned with the number selected for cleanup of PCBs. Even though carrying out the activities outlined in the Addendum as it is currently written will help to mitigate the environmental problems remaining at Site 15, EPA believes the proposed cleanup levels for PCBs will not satisfactorily remediate the threat to ecological receptors posed by the contaminant.

We appreciate the opportunity to review this Action Memorandum Addendum. Please call me at (415) 744-2367 if you have any questions regarding these comments.

Sincerely,



Anna-Marie Cook
Remedial Project Manager

cc: Michael McClelland, SWDIV
Mary Rose Cassa, DTSC
Brad Job, RWQCB
Michael John Torrey, RAB Co-Chair
Dina Tasini, City of Alameda
Ned Black, EPA