



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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ALAMEDA POINT
SSIC NO. 5090.3

July 27, 2005

Thomas Macchiarella
NAVY BRAC PMO, Code 06CA.TM
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8571

RE: Draft Proposed Plan for IR Site 15, Alameda Point

Dear Mr. Macchiarella:

EPA has reviewed the Draft Proposed Plan for Site 15, submitted by the Navy to the agencies on June 27, 2005. This Proposed Plan has incorporated many suggested revisions given to the Navy by EPA on the previous August 24, 2004 version. However, the discussion on the derivation of risk still seems too lengthy and complex for the purposes of a Proposed Plan and the tables detailing risk remain confusing, inconsistent and contradictory. In reviewing the information in the Tables 2 and 3 on page 7, the reader is left wondering why remedial action is not being taken since the risk is over the risk management range.

The soil risk needs to state that arsenic concentrations in the soil are at levels that are the same as the rest of the base, i.e. background, and PAHs in the soil are all below 1.0 ppm BaP eq. with an average concentration below the screening value of 0.62 ppm BAP eq. Concentrations of arsenic and barium in groundwater are below state and federal MCLs and arsenic, barium and manganese are at background concentrations. These facts provide all the risk information needed to fully support taking no further action at the site.

If the tables are left in the Proposed Plan the following problems should be corrected:

- "Site" should be written "Site 15" and "Background" should be written "Alameda Point Background".
- The groundwater concentrations for arsenic and barium are below the MCLs and manganese does not have an MCL. There should be an additional column in Table 3 stating the MCLs (federal and state) for these contaminants since, although they are above the risk range, they fall below the MCL level and therefore the decision for no action is supported.
- As we noted in our letter of August 24, 2004, the risk level for background concentrations of arsenic in groundwater is 2.2×10^{-4} , not 8×10^{-4} as stated in the table. It serves no purpose, other than to potentially falsely alarm the community, to leave such a high, and incorrect, risk number as background. Additionally, it looks strange that Site 15

groundwater risk from arsenic should be significantly lower (8 times) than the stated background risk of 8×10^{-4} .

- As noted in our letter of August 24, 2004, the risk numbers do not add up. Please provide all relevant information to support the numbers, or if the information is not pertinent to the no action decision, revise the totals so that they add up correctly.
- Again, as noted in our August 24, 2004 letter, the numbers given in the two tables do not correlate and it is not obvious what has been left out and why. Please add all relevant information, or revise the tables to reflect the correct addition and subtraction values.
- Page 4 states that the average site concentration of PAHs is below the 0.62 ppm BaP eq. screening level and that PAH sampling in 2003 and 2005 found all PAHs below 1.0 ppm BaP eq. The risks presented in the table should not be those from previous data, but from the current, newer, confirmation data taken in 2003 and 2005. The most recent samples were taken in areas of previous higher hits and the higher concentrations are no longer there. Therefore, the risk is no longer that associated with the old data, but rather should reflect current conditions. It does not support the no action proposed alternative to use outdated risk data in these tables.
- Why is only surface soil risk presented in these tables, and what defines surface soil? Typically remedial actions look at deeper soil too, and it seems an omission to not include that information and risk.
- Arsenic risk levels at this site are the same as those for Site 25, which have been attributed to background. It would seem that the incremental risk from arsenic, in the apparent absence of site related arsenic releases, would be 0.

The following are additional comments from Suzette Leith, ORC and from Sophia Serda, toxicologist:

EPA Office of Regional Counsel Comments:

1. Page 4, last white paragraph beginning "As described below..." As written, the implication is that the decision to take no further action was based solely on the risks being within the risk management range. That is contrary to the procedure described in the NCP under which risks within that range are further evaluated based on site-specific considerations. EPA recommends that the first sentence in that paragraph instead use the language in the box on page 8, which notes that risks are low and that they fall within the risk management range. Similarly, on page 6, the last white paragraph beginning "Because incremental risk..." should also be changed consistent with this comment and with the language in the box on page 8.
2. The grammar on the first sentence in the box on page 5 needs to be changed to "The BCT, which is comprised by the Navy, EPA, DTSC and the Water Board, was established..."
3. On page 6, total cancer and HI risk is given, and then there is a discussion of incremental risk, but incremental risk numbers are not given. This omission is confusing and raises questions of what the incremental risk numbers are.

4. Page 7, footnotes regarding risk ranges. Footnote 2 should be replaced by the following: "For cancer risks within the risk management range, site-specific factors are considered when making decisions about whether action is required to reduce human exposure to soil or groundwater."
5. Page 9, boxes at top. Consistent with the comments above, the second sentence in the box beginning "Between 1991 and 2005" needs to be changed to reflect not only that the risks are within the risk management range, but that they are low. "EPA protective risk range" needs to be changed to "EPA risk management range".

Comments from EPA's toxicologist, Dr Sophia Serda:

1. The risk assessment text found on pages 5 - 6 and in Tables 1 - 3 is too much information and is very confusing. I suggest the information in the text box on page 5 "Multi-Agency Environmental Team Concurs with no Further Action Proposals" be supplemented with some risk information.
2. The risk information appears a mess and much of the information contradicts a "low-risk" for Site 15. Use only the most recent data to describe site risk.

We look forward to receiving a Draft Final Proposed Plan on August 27, 2005 that makes a more compelling case for the proposed no action for Site 15. Please call me at (415) 972-3029 if you have any questions regarding these comments.

Sincerely,



Anna-Marie Cook
Remedial Project Manager

cc Glenna Clark, SWDiv
Marcia Liao, DTSC
Judy Huang, RWQCB
Suzette Leith, EPA
Sophia Serda, EPA
John Chesnutt, EPA