



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105  
SFD 8-3

N00236.002287  
ALAMEDA POINT  
SSIC NO. 5090.3

February 28, 2006

Mr. Thomas Macchiarella, Code 06CA.TM  
Department of the Navy  
Base Realignment and Closure  
Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4310

**RE: Draft Record of Decision Former Transformer Storage Area Site 15, Alameda Point**

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document prepared and submitted by the Navy on December 27, 2005. In general, the Record of Decision is satisfactory and we request only a few revisions, clarifications and edits as detailed in the enclosed comments and also sent via e-mail on 02-27-2006.

Please call me at (415) 972-3029 if you have any questions on our comments. We look forward to seeing the Draft Final ROD by April 28, 2006.

Sincerely,

A handwritten signature in cursive script that reads "Anna-Marie Cook".

Anna-Marie Cook  
Remedial Project Manager

enclosure

cc list: Steven Peck, BRAC PMO  
Dot Lofstrom, DTSC (Sacramento)  
Judy Huang, RWQCB  
Peter Russell, Russell Resources, Inc  
Suzette Leith, EPA  
John Chesnutt, EPA

**EPA Comments on Draft Record of Decision  
Former Transformer Storage Area Site 15, Alameda Point**

1. **Page D-i, Statement of Basis and Purpose, first paragraph:** The selected remedy should be presented as no further action for soil and no action for groundwater, since no action has been taken to address groundwater in the past.
2. **Page D-i, Statement of Basis and Purpose, second paragraph:** Please delete the phrase “to the extent practicable”
3. **Page D-i, Statement of Basis and Purpose, third paragraph:** The phrase “review of current and future conditions” seems awkward, since “review” implies assessing something that has already occurred. Suggest replacing with “evaluation of current and future conditions”.
4. **Page D-iii, Kathleen Johnson’s signature block:** Replace “Facility” with “Facilities”
5. **Page 1-1, first paragraph, last sentence:** Suggest adding in no further action for soil and no action for groundwater..
6. **Page 1-5, Table 1-1, Site Description, first paragraph:** Switch the second and third sentence in this paragraph for better continuity.
7. **Page 2-1, Section 2.1, first paragraph, last sentence:** Suggest removing the word “history” and replacing it with “operation”.
8. **Page 2-2, first paragraph, second sentence:** Please revise to read “...with relatively low levels of contamination related to storage of PCB-containing transformers; use of historical petroleum, oil and lubricants; lead-based paint from buildings; and PAHs possibly associated with fill material used to create the installation.” This description is consistent with that presented in the PP and explains the presence of PCBs, lead and PAHs at the site.
9. **Page 2-2, first paragraph, last sentence:** Recommend deleting this sentence since it is confusing and unnecessary.
10. **Page 2-2, third paragraph, first sentence:** Please revise the sentence to state “CERCLA applies to sites where a hazardous substance is known or suspected to have been released to the environment.”

11. **Page 2-2, third paragraph, fifth sentence:** Remove the word “of” so the phrase reads “when both CERCLA and RCRA apply to a single site.”
12. **Page 2-3, first paragraph, last sentence:** Add “s” to polychlorinated biphenyls (PCBs) to make it plural.
13. **Page 2-3, third paragraph, second sentence:** Delete the phrase “along with Site 4 (partial), 5, 6, 7A, 7B, 8, 10A, 11 and 12”. It is not relevant to the understanding of the investigation at Site 15 and, because some of the site designations have changed since the 1991 study, is confusing to include.
14. **Page 2-3, third paragraph, last sentence:** Since there is no action for groundwater it would be helpful to mention here why future quarterly groundwater monitoring was recommended.
15. **Table 2-1:** Missing from this table, and providing relevant information for the no further action for soil, are the basewide 2003 and Site 15 2005 PAH sampling events.
16. **Page 5-3, third and fourth full paragraph:** The second full paragraph indicates that after the removal there were samples showing PCBs and lead concentrations in excess of the cleanup goals.. The re-sampling in 2003 showed there weren't. Please provide more description of the sampling and further explanation why no contamination above action levels was found. Same problem for the PAHs in the fourth paragraph.
17. **Page 5-4, Table 5-1.** It's not clear what “yes” and “no” mean in the background column. Does it mean that the metal occurs in background, or does it mean that the concentration is similar to that found in background? Also, for chemicals reported above the action level such as Aroclor-1260 and lead, there should be an asterisk that denotes that subsequent sampling to delineate the contamination showed soil concentrations to be below action levels
18. **Page 5-7, Table 5-3.** Same comment as above about the background column. Also, for contaminants where concentrations are in excess of MCLs (e.g. antimony), we recommend providing a footnote with an explanation of why no action is appropriate for groundwater. Usually the reason is that there are only one or two hits out of ten samples and the concentrations are only marginally in excess of MCLs.
19. **Page 7-5, first paragraph, last sentence:** The statement “Total cancer risk to a resident at Site 15 is within the risk management range, and the noncancer risk HI is above 1” contradicts Table 7-2 where the total risk to a resident is  $2 \times 10^{-4}$  and is therefore above the risk management range. On page 7-6, the risk is attributed to certain metals which the text states failed the background comparison. However, in seemingly contradictory statements, the metals are subsequently attributed to background because there isn't any

evidence of site related activities. This logic is somewhat circular, and doesn't provide assurance that the metals should not be cleaned up. Please clarify and expand the explanation for taking no action. For example, state that the average concentration for arsenic in soil is 4.7 mg/kg which falls on the lower end of what is typically seen at Alameda Point and in the Bay Area and therefore does not warrant clean up. Additionally, there were only two hits of arsenic out of ten in groundwater and both concentrations were below the MCLs, making cleanup unwarranted. Apply similar logic to the other metals.

20. **Page 7-9, Table 7-2:** This table poses a problem in that the risk, both cancer and non-cancer, for residential appears to warrant action because it falls above the risk management range. Included with this table should be an explanation of why no action is appropriate (see above comment).
21. **Attachment A:** Please include in the Administrative Record Index the PAH sampling that took place basewide in IR sites in 2003 and the Site 15 PAH sampling from 2005.
22. **Attachment A:** Please note that EPA rejected the "Final Feasibility Study Report for OU 1, Sites 6, 7, 8 and 16" dated 09-28-2005 (see e-mail from Cook to BCT members sent 10-05-2005). The FFA made no allowance for the submittal of this document. EPA recognizes and works from the Draft Final Feasibility Study Report for OU 1 Sites 6, 7, 8 and 16 which was submitted on 06-15-2005 and went final on 07-15-2005. Please revise the Admin Record Index to show that the 09-28-2005 document is a Navy document which was not accepted and reviewed by EPA, and please include the Draft Final Feasibility Study Report for OU 1, dated 06-15-2005, as the Final Feasibility Study Report for OU 1 in the Admin Record Index.
23. **Section 8 and 9:** The Navy is selecting no action for groundwater and no further action for soil. (See comment #1).