



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

N00236.002435
ALAMEDA POINT
SSIC NO. 5090.3

July 26, 2005

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

RE: Draft Site Management Plan Schedule Addendum for 2006, Alameda Point

Dear Mr. Macchiarella:

EPA has reviewed the Alameda Point Site Management Plan for Fiscal Year 2006 prepared in accordance with the Alameda NAS Federal Facility Agreement. We reviewed the June 20, 2005 submittal of the SMP and have prepared comments on that document, although we understand that the Navy has since started revising some deadlines in response to verbal comments given by EPA earlier in July. Our comments are enclosed with this letter.

We appreciate that all projects are moving forward as planned and anticipate that FY 2006 will yield marked results in terms of Proposed Plans, Records of Decisions and beginning remedial action. We look forward to working together toward the clean up and transfer of Alameda Point.

Sincerely,

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

Anna-Marie Cook
Remedial Project Manager

cc: Gregory Lorton, SWDiv
Marcia Liao, DTSC
Judy Huang, RWQCB
Elizabeth Johnson, City of Alameda
Peter Russell, Russell Resources
Jean Sweeney, RAB Co-Chair
John Chesnutt, EPA

**EPA Comments on the Draft Site Management Plan Schedule Addendum for 2006,
Alameda Point**

Overall Comments:

1. Please ensure that the Preliminary Design documents are submitted either in advance or concurrent with the Remedial Action Workplan documents. In cases of more complex designs, EPA would prefer to receive and comment on the Preliminary Design document prior to receiving the Draft Remedial Action Workplan.
2. There information on Operable Unit 2A is missing. Please send a copy of it as soon as possible for EPA to review prior to the SMP going final.
3. The duration given for Remedial Design does not reflect the level of complexity of each site or operable unit. For example, the length allotted to RD for Site 26 is six months, and the time assigned to RD for Site 2, a significantly larger and more complex site than Site 26, is also six months. These durations should be changed to better reflect the time actually needed for RD and to give more realistic milestone dates.
4. The duration given for Remedial Actions is not consistent with the level of complexity at each site/operable unit. For example, a period of 700 days is assigned to perform the remedial actions for Operable Unit 1, and a period of 642 days for Operable Unit 2B, and 669 for Operable Unit 2C. Yet OUs 2B and 2C are much more complex and contaminated than OU 1, and the length of RAs should be adjusted accordingly. Please approximate more realistic site specific or operable unit specific milestones for the RA work.

Specific Comments:

1. Update line 44 to reflect a 30-day revision period rather than a 60-day period.
2. After line 686, the Design documents for Site 30 are missing.
3. Line 761, documenting 245 days (eight months) of field work for Site 32 seems excessive when Site 20 took 54 days, Site 30 took approximately 30 days, Site 31 will take 105 days (3 months). Please provide a reason for the large amount of time allocated to field work for a fairly small site.
4. Line 818, documenting 180 days in the field and Line 819 with six months for RI report preparation (total of a year from start of field work to submittal of RI report to agencies) seems excessively long for a small site. Please provide a reason for the length of time required or reduce it to imitate the more appropriate Site 30 and 31 time frames.

5. The Community Relations Plan is a primary document and as such needs a 60 day review period by the EPA, the State and the community with a 60 day Response to Comments period by the Navy and a 30 day review by the regulators and community of the Draft Final CRP. (Section 10.3 and Section 34 of the FFA). Please include the milestone dates for review of the CRP in the SMP.
6. The Annual Groundwater Basewide Monitoring Reports are also primary documents and need to have the appropriate review times included in the SMP. Please add these in starting at Line 953.
7. Correct the spelling of the "Feasibility Study Report" header on Lines 54, 421, 579, 623, 716 and 767.