



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

N00236.002442
ALAMEDA POINT
SSIC NO. 5090.3

April 12, 2005

Thomas Macchiarella
BRAC Operations, Code 06CA.TM
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

RE: Draft Action Memorandum, Time Critical Removal Action at IR 30 (Miller School/Woodstock Child Development Center), Alameda Point

Dear Mr. Macchiarella:

EPA has reviewed the Draft Action Memorandum for IR Site 30, prepared by Shaw Environmental Inc and submitted by the Navy on March 9, 2005. We offer the following, mostly minor, comments and would like to call your attention to comment #6 for all future Action Memoranda.

1. **Page 2-1, Section 2.2, first paragraph, last sentence:** Reword to read "The concentration value is used as a basewide human-health screening value as agreed to in 2001 (U.S. Department of Navy, 2001).
2. **Page 2-1, Section 2.2, second paragraph, second sentence:** Remove the word "mostly". Third sentence reword to read "As such, before the implementation of the removal action, there was a potential exposure to children, as well as adults, from PAHs in the soil..."
3. **Page 2-3, Section 2.8:** Replace "contamination by non-PAH chemical substances" with "contamination from non-PAH chemical substances".
4. **Page 2-3, Section 2.9, first paragraph, first sentence:** Reword to read "Alameda Point is a federal facility."
5. **Page 2-3, Section 2.9, second paragraph, first sentence:** Replace the word "concurrence" with "oversight". Also remove "concurrence" from the second sentence in this paragraph.

6. EPA regulations require that the Navy take public comment based on the administrative record within 60 days of initiation of the fieldwork. This action memorandum is a key component of the administrative record and should have been available for public comment as of January 18, 2005.
7. In the ARARs discussion, page 5-3, it states that there are no action-specific ARARs, although previously on page 5-1, it is stated that dust monitoring was performed. It seems that the dust-suppression ARARs from the BAAQMD regulations should apply. Under location-specific ARARs, same page, there is no discussion about whether there are any endangered species in the area that would trigger ESA.

We appreciate the opportunity to review this Action Memorandum. Please call me at (415) 972-3029 if you have any questions.

Sincerely,



Anna-Marie Cook
Remedial Project Manager

cc list: Darren Newton, SWDiv
Marcia Liao, DTSC
Judy Huang, RWQCB
Elizabeth Johnson, City of Alameda
Peter Russell, Russell Resources, Inc
Jean Sweeney, RAB Co-Chair
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