



October 1, 2004

Mr. 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

*Tom*  
Dear Mr. ~~Macchiarella~~:

Thank you for the opportunity to comment on the June 29, 2004 *Revised Draft Site Inspection Report, Transfer Parcel EDC-5, Alameda Point, Alameda, California (EDC-5 SI Report)*. Dr. Peter Russell, P.E. of Russell Resources, Inc., ARRA's primary BCT representative, has reviewed this report on behalf of ARRA.

The *EDC-5 SI Report* is well written and succinct. It is an excellent compendium of the results for prior work in EDC-5. ARRA concurs with much of the USEPA's September 1, 2004 comments on this report. In addition, ARRA offers the following comments:

For many EBS Parcels with potential volatile organic compounds (VOCs) contamination, USEPA comments that soil samples should be analyzed for VOCs, followed by groundwater sample analysis if the soil analytical results are positive, for example, EBS Parcels 45A, 82, 205, 79, 83, 84, 92, 93, 110, 111, 71, 185, and 195. Because substantial VOC releases sometimes have relatively small entry-point footprints, serious groundwater contamination can occur without easy detection in soil samples, unless a soil sample happens to be collected directly at the release site. When VOCs migrate directly downward through soil to groundwater, little surface expression of the release is present. Please analyze VOCs in grab groundwater samples collected downgradient of potential VOC release sites, regardless of whether soil samples detect VOCs.

"There were no chemicals reported at concentrations above detection limits in groundwater" is frequently used with Decision Areas and Parcels for which no useable groundwater analytical results are available. Please replace this with language that distinguishes between instances when no analytical results exist and instances when analytical results exist, but contaminants were not detected. It is important that readers not equate absence of data with absence of risk.

Development Services Department

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There are inconsistencies between Table 3-1 and Table 3-2. For example, the entries on Table 3-2 for EBS Parcels 71 and 195 note wash-down areas, but there is no mention of these areas on Table 3-1. Similarly, the Table 3-2 entry for EBS Parcel 126 identifies smelting operations, no mention of which appears on Table 3-1. These inconsistencies should be corrected because these operations are potential contaminant sources.

The EBS Parcel 197 on Table 3-2 doesn't mention any metal detections above EBS Screening Criteria, yet Figure 4-7 shows several such detections, all of which may be associated with the adjacent IR03 Site. This discrepancy should be resolved.

Some buildings listed on Table 3-1 appear not to be on the figures; for example, Building 178 (transformer house) on EBS Parcel 98, Building 83 (insect vector control) on EBS Parcel 103, and Building 453 (incinerator) on EBS Parcel 109.

Please coordinate scheduling of any agency working sessions related to next steps for EDC-5 with Peter Russell so that he can attend. Feel free to call Peter directly if you have any questions at 415-492-0540.

Sincerely,

A handwritten signature in black ink that reads "Debbie Potter". The signature is written in a cursive, flowing style.

Debbie Potter  
Base Reuse and Redevelopment Manager

cc: Peter Russell