



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

August 9, 2007

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 Final Soil Remedial Investigation Report for IR Site 31 Marina Village  
Housing, Alameda Point**

Dear Mr. Macchiarella:

EPA has reviewed the Draft Final RI Report for IR Site 31 and the accompanying Response to Comments on the draft version of the document. After reviewing the available information, and after extensive discussion with the DTSC project manager, we will concur with the conclusions and recommendations in the RI Report.

We do not believe that the draft final document and response to comments was prepared in the spirit of collaboration that has been the hallmark of this team on other projects. Please be aware that Sections 16.1 and 16.6 of the FFA state that Project Managers must be consulted to the maximum extent practicable concerning communications on all documents. The bulk of EPA's comments on the draft RI Report pertained to requesting a better analysis of arsenic levels in the surrounding properties and how they compared to Site 31. EPA was only made aware that this request would not be addressed after reading the Navy's response to our General Comment #1 which states: "The initial approach discussed in the meeting with the regulatory agencies on August 24, 2006, was to evaluate data for IR Site 25, College of Alameda, the FISCA property, and the East Housing Area as potential sources of background data for IR Sites 30 and 31 in lieu of the Alameda Point pink background data set. However, subsequent to that meeting, it was determined that it is unnecessary to identify a new background data set for this area."

EPA was not aware of discussions between the Navy contractor and the DTSC toxicologist during which it appears the approach of performing statistical analysis on only the Site 31 data to determine background was concurred on and the previously agreed upon approach abandoned. We also do not think it is appropriate to cite DTSC HERD statements or comments in response to USEPA comments.

We request that in future, all project managers be consulted as new approaches are developed and risk management decisions are made. We thank you for your consideration in this matter.

Sincerely,

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

Anna-Marie Cook  
Remedial Project Manager

cc list: Mary Parker, Navy  
Dot Lofstrom, DTSC  
Erich Simon, RB  
John Chesnutt, EPA