



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

September 19, 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: Review of the Draft Final Site Inspection Report, Transfer Parcel EDC-12,
Alameda Point, Alameda, California, August 2007**

Dear Mr. Macchiarella:

The U.S. Environmental Protection Agency (EPA) Region 9 has received the Draft Final Site Inspection Report, Transfer Parcel EDC-12, Alameda Point, Alameda, California, dated August 28, 2007. We have reviewed the aforementioned document and the Navy's responses to our December 7, 2006 review comments on the draft version. Our comments are enclosed.

If there are any questions, please feel free to contact me at (415) 972-3002.

Sincerely,

A handwritten signature in black ink, appearing to read "Xuan-Mai Tran".

Xuan-Mai Tran
Remedial Project Manager
Federal Facilities and Site Cleanup Branch

Enclosure

cc: John Kowalczyk, BRAC PMO, West
Dot Lofstrom, DTSC Sacramento
Angela Singh, DTSC Sacramento
John West, SFRWQCB
George Humphreys, RAB Co-Chair
Peter Russell, Russell Resources, Inc.
Suzette Leith, EPA
John Chesnutt, EPA
Anna-Marie Cook, EPA

**Review of the Draft Final Site Inspection Report, Transfer Parcel EDC-12,
Alameda Point, Alameda, California, August 2007**

GENERAL COMMENT

In the responses to EPA comments included in Appendix G of the Draft Final Site Inspection Report, Transfer Parcel EDC-12 (the SI Report), the Navy proposes conducting an aircraft parking and staining evaluation for EBS Parcels 134, 140, 141, 150, 150B, 151, 153, 154, 155, 159, 160, 164, 199, 201, and 202 to review whether activities associated with aircraft parking, maintenance, and/or washdown were potential sources of contamination, but it is unclear when this will be done and what criteria will be used. As previously stated in EPA comments, the lack of staining in one aerial photo does not mean that it was not present in earlier times, and a review of photos that were taken several years apart may not necessarily show all staining. At a minimum, soil and groundwater sampling in stained areas should be conducted. If no stained areas are present, it is recommended that representative samples be collected in aircraft parking areas that do not show evidence of staining, as contamination could be present that was not easily observable on aerial photos. Please provide details on when this evaluation will be conducted, provide the criteria for this evaluation and incorporate recommendations for sampling to address potential contamination in aircraft parking areas into the SI Report.

RESPONSES TO COMMENTS

Response to General Comment 5, Response to Specific Comments 8 and 17, and Figure 7-1, Areas Recommended for No Further Evaluation and Areas of Concern: Since aircraft parking areas and staining are visible on aerial photographs across most of EBS Parcel 159, it is unclear why only the southern portion is recommended for further samples. The last paragraph of the response to Specific Comment 17 indicates that the Navy "will conduct an additional evaluation of areas where aircraft parking and staining may have occurred throughout Transfer Parcel EDC-12." Please revise the recommendations to include further sampling in all of EBS Parcel 159.

Response to General Comment 8: The response addresses the comment. However, the information provided in the response should be incorporated into the SI Report, perhaps in Section 2. Please include this information in the SI Report.

Response to Specific Comment 1: EBS Parcel Numbers were not added to Figure 1-3 as indicated in the response. Please include the EBS Parcel Numbers in Figure 1-3.

Response to Specific Comment 21: The response did not address the issue that Table B3-1 in Attachment A indicates that the generator accumulation point (GAP) identifier number is 612 rather than 621 (i.e., it appears that numbers have been transposed). Please revise Table B3-1 to reference GAP 621.

Response to Specific Comment 27: Section 7.8 was not revised to include lead as a contaminant of concern (COC). Since the response indicates that lead was detected in sediment collected from the storm drain catch basin located immediately south of Building 167, lead should be included as a COC in the recommendations. Please revise Section 7.8 to include lead as a COC in this area.