



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

September 13, 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-17,
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-17, Alameda Point, Alameda, California, dated August 16, 2007. We have reviewed the aforementioned document and the Navy's responses to our February 8, 2007 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", written in a cursive style.

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-17,
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GENERAL COMMENT

The Navy proposes conducting an aircraft parking and staining evaluation for EBS Parcels 163, 165, 166, 167, and 169 to review whether activities associated with aircraft parking, maintenance, and/or washdown were potential sources of contamination. Please provide details on when this evaluation will be conducted, and incorporate recommendations for sampling to address potential contamination in aircraft parking areas in the SI report. 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.

Response to General Comment 3: The comment asked whether total risk estimates for the various areas evaluated in the human health risk evaluation (HHRE) of the Draft Site Inspection (SI) Report for Transfer Parcel EDC (Economic Development Conveyance)-17 (i.e., parcels 163, 165, 166, 167, and 169) were presented and whether institutional controls are necessary to limit or otherwise preclude specific future land uses. The Draft Final SI Report dated August 2007 does provide a summary table (i.e., Table 5-1 Summary of Cancer Risk and Hazard Indices by EBS [Environmental Baseline Survey] Parcel) conveniently presenting total and incremental risk for each individual EBS Parcel evaluated (and which was not contained within the December 2006 Draft SI Report). However, please clarify the basis for the last column in the "Cancer Risk" section of the table. It is unclear whether the last column should remain as "Incremental Risk for Groundwater" or if the value presented in the final column of the "Cancer Risk" section corresponds to incremental risk for groundwater and soil. Also, groundwater risk estimates are predicated solely on volatile organic compounds (VOCs). Hence, groundwater incremental risk should not deviate from groundwater total risk as displayed in Table 5-1. Please explain why total and incremental risks for groundwater are not analogous values and/or revise Table 5-1 accordingly.

Further, it does not appear that the Draft Final Report has addressed the issue of the need for institutional controls (ICs) based on incremental or total risk. Please provide discussion pertaining to whether the ICs will be necessary for EDC-17 based on future land use.

Response to Risk Assessment General Comment 4: The justification provided for exclusion of dermal contact with groundwater by a future construction worker still does not appear to be sufficient (i.e., standard industrial practices). Considering the depth to groundwater is within 10 feet below ground surface (bgs) and direct contact with groundwater is a plausible exposure pathway for a construction worker receptor during trenching activities, a quantitative assessment of this exposure pathway is preferred as a component of the baseline assessment, even if this potential exposure will be addressed through the implementation of ICs (e.g., personal protective