



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

N00236.002912
ALAMEDA POINT
SSIC NO.5090.3

September 27, 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 for Western Bayside and Breakwater Beach, 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 for Western Bayside and Breakwater Beach, Alameda Point, Alameda, California, dated August 30, 2007. We have reviewed the aforementioned document and 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: Mary Parker, BRAC PMO
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, Western Bayside and Breakwater Beach,
Alameda Point, Alameda, California, August 2007**

GENERAL COMMENT

Concentrations of several metals, polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and 4,4-DDT exceeded the respective ecological sediment effects range-median screening criteria (ER-Ms), but the Draft Final Site Inspection Report, Western Bayside and Breakwater Beach (the Draft Final SI) recommends no further action (NFA) for both areas. This was based on the conclusion for each area that the risks calculated in the human health risk assessment and the baseline ecological risk assessment were acceptable. The recommendation for NFA could be strengthened by stating (if true) that sedimentation will gradually cover areas where concentrations exceed ER-Ms. Please revise the recommendations to include a brief discussion of sedimentation and the likelihood that this will minimize the potential for exposure to sediment at these sites.

RESPONSES TO COMMENTS

Response to Human Health Risk Assessment Comment 3: In general, the response to this comment pertaining to surface water exposure is adequate. However, please consider qualitatively accounting for direct contact with surface water as a potentially viable exposure pathway in Section 7 (Uncertainty). Such a qualitative discussion may include an assessment of the relative risks potentially incurred by a recreational user via contact with surface water and the degree to which the exclusion of this exposure pathway is likely to impact the total quantitative point estimate of risk and hazard.

Please also clarify that direct contact with surface water is a potentially complete but insignificant exposure pathway to address this issue and the following discrepancies:

- Executive Summary, page v, which states, “Direct contact with surface water was identified as a complete pathway...”
- Section 5.2.1 (Exposure Pathways and Receptors), page 5-3, which states, “Direct contact with surface water was identified as an incomplete pathway...”
- Human Health Conceptual Site Models presented in Figures 5-1 (for Western Bayside) and 5-2 (for Breakwater Beach), which identify incidental ingestion and dermal contact as “incomplete pathways” (with dashed arrows), but also “complete but minimal exposure pathways” (with white circles) for the recreational user.