

**EPA Comments on Draft Proposed Plan for  
Installation Restoration Site 31 Soil  
Marina Village Housing, Former NAS Alameda**

**General Comments:**

1. EPA commends the Navy for a Proposed Plan that is well written with clear explanations and support given for the decisions reached for Site 31.
2. Please remove the word “further” prior to all phrases containing the term “no further action”. The remedy selected in this Proposed Plan is “no action” because there have been no removals or other environmental mitigation measures performed previously at this site under CERCLA.

**Specific Comments:**

1. **Page 1, Column 1, first paragraph:** It sounds awkward to “review” future land uses, since review implies that something is being looked back on. Perhaps the word “appraisal” would work better.
2. **Page 1, Column 1, second paragraph, third line:** change “was” to “were.”
3. **Page 1, Column 1, second paragraph, fourth line:** change “regulation” to “law” or “statute.”
4. **Page 1, Column 1, second paragraph:** The sentence “The RI concluded that the soil at IR 31 has no impact on groundwater and that ...” should come after a statement that the IR 31 RI was designed to assess whether any contamination was present in soil at levels that would pose an unacceptable risk to current and future residents. The impact to groundwater from IR 31 was more a secondary concern and objective than the actual assessment of possible releases to soil from prior Navy activities. The first two sentences from the beginning of the second paragraph of page 3 could be inserted here.
5. **Page 1, second column, first line:** after “Site 31,” recommend adding “, and which is being addressed separately.”
6. **Page 1, second column, line 5:** delete “new.” There are currently no land-use restrictions addressing soil.
7. **Page 1, last line:** change “cleanup” to “remedial.”
8. **Page 2, first paragraph:** in two places change “cleanup” to “remedial action.”

9. **Page 2, first paragraph, fifth line:** add “procedures” after CERCLA. As written, it sounds like CERCLA specifically discusses RIs and skipping the FS, which it doesn’t.
10. **Chart on page 2:** It’s a little confusing to have a chart indicating the FS stage when, here, there is no FS.
11. **Page 3, Column 1, third paragraph, first sentence:** Suggest being more specific and changing the phrase “lower than regulatory comparison criteria” to “lower than regulatory criteria for residential use”.
12. **Page 3, first paragraph under Human Health Risk Assessment:** since the first sentence discusses risk to receptors other than human, we recommend that the second sentence begin with “As to humans, risk is further classified.....”
13. **Page 3, Column 2, first full paragraph, second sentence:** Please revise to read “The Navy used EPA guidance to evaluate the different ways in which people might be exposed to the chemicals in soil, possible concentrations of the ...”
14. **Page 3, Table 1:** Suggest changing title to read “Soil Exposure Pathways for Current and Potential Future Human Receptors”
15. **Page 3, Column 2, first paragraph following Table 1:** Suggest moving the last sentence to the beginning of this paragraph and also changing the wording slightly so that it reads “Groundwater at IR 31, within the Operable Unit 5/IR-02 plume, is being treated as part of a separate remedial action. The potential risks associated with groundwater have been addressed in the Operable Unit 5/IR-02 Proposed Plan and are not included in the IR 31 Proposed Plan.” Then state “The soil exposure pathways are based on current and future reasonable exposure scenarios, including residential use. To account for...”
16. **Page 3, last paragraph:** It seems out of place to be citing statistics from the American Cancer Society in the context of a Proposed Plan, although we understand that the intent is to put the environmental health risks into perspective. We recommend removing the reference to the 0.2 risk of developing cancer and presenting the risk for example: “A 1 in 10,000 chance is a risk of  $1 \times 10^{-4}$ . In this case, for every 10,000 people, one additional cancer case may occur as a result of exposure.”
17. **Page 4, Ecological Risk Assessment:** This paragraph does not provide very much information or support for the findings of the eco risk assessment. The description offered in the Site 35 PP, where a similar approach was employed to Site 31, gives more information and can be used as a template.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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December 11, 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 Proposed Plan for Installation Restoration Site 31 Soil Marina Village  
Housing, Former NAS Alameda**

Dear Mr. Macchiarella:

EPA has reviewed the above referenced Proposed Plan and we enclose our review comments with this letter. The Proposed Plan is well written and presented, supporting the no action decision proposed by the Navy and the regulators. We anticipate moving forward quickly to the final Proposed Plan, and encourage the Navy to schedule the public meetings for Site 20 and Site 31 Proposed Plans back-to-back on the same evening, minimizing costs and time expended.

Please call me at (415) 972-3029 if you have any questions.

Sincerely,

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

Anna-Marie Cook  
Remedial Project Manager

enclosure

cc list: next page

cc list: Mary Parker, Navy  
Dot Lofstrom, DTSC  
John West, Water Board  
Peter Russell, Russell Resources, Inc  
Suzette Leith, EPA  
John Chesnutt, EPA