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From: Ramsey.Phillip@epamail.epa.gov
Sent: Wednesday, August 30, 2000 1:30 PM
To: McClellandME@efdswnavfac.navy.mil; OcampoLA@efdswnavfac.navy.mil
Cc: Mcassa@dtsc.ca.gov; lbj@rb2.swrcb.ca.gov
Subject: Marsh Crust RAP/ROD, ALAMEDA FACILITY ALAMEDA ANNEX
ALAMEDA POINT

Hello Michael and Lou: In response to phone conversations I had individually with the two of you earlier today, I am providing these comments on the Marsh Crust RAP/ROD. If comments provided by U.S. EPA and DTSC are integrated (and the Navy doesn't make unexpected changes), we may not provide any further comments and expect to sign the RAP/ROD. Included are U.S. EPA comments on the pre-final RAP/ROD transmitted to U.S. EPA on August 25, 2000:

1. Please restore in text references to U.S. EPA involvement with the Marsh Crust RAP/ROD. This document should be signed by U.S. EPA since it deals, in part, with land which is part of the NPL site (see U.S. EPA's June 9, 2000, draft Proposed Plan/draft RAP/ROD review letter, Marsh Crust RAP/ROD comment number 1).

2. Please restore in text reference to U.S. EPA involvement with LUCICP review and approval. (see U.S. EPA's July 19, 2000, draft RAP/ROD review letter, comment number 5).

3. The discussion of the July 20, 2000 deed transferring title from the Navy to the City of Alameda is confusing. The implication is that this deed transferred the entire Alameda Point. The document should clarify what was transferred. Assuming that what was transferred was **only** the Annex and the East Housing area, the discussion of Environmental Restriction in Deed (page 1-3 of redline version), line three should read, "the Alameda Facility/Alameda Annex and portions of Alameda Point to the City of Alameda..." In addition, there should be a sentence that the same restrictions will be included in any future deeds transferring other portions of Alameda Point which might include Marsh Crust. (same issue on page 2-24 and on page 2-47 of redline version).

4. Similarly, references to the July 20, 2000 covenant between DTSC and the City (e.g., item 2 on page 1-5 of redline version) should clarify what property is covered. (Same language on page 2-24 and 2-47 of redline version).

5. U.S. EPA's July 19, 2000, draft RAP/ROD review letter, comment number 10, stated "U.S. EPA considers it crucial that the Navy acknowledge that it can and will enforce the Environmental Restriction in the Deed. The document should make it clear that the Navy can and will enforce the restrictions in the Deed." Language that "future compliance with the provisions will be the responsibility of DTSC" implies that the Navy is leaving all compliance responsibility to DTSC. This language is on page 2-25 and 2-36 of the redline version.

6. The RAP/ROD should use the same terms as the Proposed Plan for characterizing Marsh Crust contamination. The Proposed Plan refers to PAHs and TPH, while the RAP/ROD used various terms including SVOCs and "compounds". Consistent with the Marsh Crust Proposed Plan, U.S. EPA recommends that the RAP/ROD refer to Marsh Crust soil contamination as containing PAHs and TPH.

7. Sections 2.2.1 and 2.5.4, contains statements which indicate the historical former San Francisco Bay Airdrome may have used/stored hazardous chemical and may have disposed of hazardous chemicals, which may have resulted in groundwater contamination. U.S. EPA does not believe these statements have been supported by site documentation or site investigations and we request that they be deleted from the text.

TO: ADMIN MEMO
6 X-COPIES
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8. In Section 2.2.2, the description of Alameda Point includes only 4 Operable Units. Please update text to provide current status (i.e., 6 OUs).