



California Regional Water Quality Control Board

San Francisco Bay Region



Winston H. Hickox
Secretary for
Environmental
Protection

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ALAMEDA POINT
SSIC NO. 5090.3

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File No.: 2199.9285 (LBJ)

Mr. Mike McClelland, BEC
U.S. Navy
EFD Southwest
1220 Pacific Hwy
San Diego, CA 92132-5190

**Subject : Comments on Draft Site 15 Removal Action Memorandum Addendum,
Alameda Point, Alameda, California.**

Dear Mr. McClelland:

Regional Board staff has reviewed the document titled *Draft Site 15 Removal Action Memorandum Addendum, Alameda Point, Alameda, California* dated December 20, 2001. We are concerned that the proposed soil cleanup criterion for polychlorinated biphenyls (PCBs) is not sufficiently protective. Because of the existence of wetland vegetation on this portion of the site, we concur that it is appropriate to apply sediment quality goals like the Effects Range Median (ERM) in this case. However, we find it inconsistent that the Navy proposes to clean up lead to the ERM, but does not do so for PCBs. In our opinion, for San Francisco Bay, PCBs are a bigger water quality threat than lead.

The RWQCB at the direction of the U.S. Environmental Protection Agency has found San Francisco Bay to be water quality limited (excessively polluted) by PCBs. In addition, since PCBs are a bioaccumulative pollutant, it is inappropriate to rely upon dilution as a means to meet a water quality objective. In fact, the ERM value does not consider bioaccumulation and by itself would not be a sufficiently protective cleanup goal. However, based on our review of the available data, the ERM approximates the San Francisco Bay "near-shore" ambient concentration and is therefore an acceptable goal for the RWQCB.

We believe that to be consistent and protective, the removal action memorandum should be amended to reflect that the cleanup goal for PCBs is the ERM of 0.18 mg/kg.

Should you have any questions regarding this matter, please contact me at (510)-622-2400.

Sincerely,

Brad Job, P.E.
Water Resources Control Engineer

California Environmental Protection Agency

Mr. Mike McClelland

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