



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

N00236.001924  
ALAMEDA POINT  
SSIC NO. 5090.3

October 18, 2002

Glenna Clark  
BRAC Operations, Code 06CA.GC/0718  
Department of the Navy, Southwest Division  
Naval Facilities Engineering Command  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101

RE: Draft Remedial Investigation Report, Sites 14 and 15, Alameda Point

Dear Ms. Clark:

Please find enclosed EPA's review of the above referenced document, prepared by Tetra Tech EMI and submitted by the Navy on August 15, 2002. Dr Sophia Serda's comments are also attached. As discussed in the BCT meeting of October 15, 2002, EPA would like to see revisions performed on the ecological risk assessment to make it more comprehensive. In addition, the regulatory agencies have requested that the ingestion pathway for groundwater be included in the risk assessment to form a baseline from which to determine appropriate remedial actions. We do not anticipate that either of these additions will result in significant changes to the understanding and scope of the document and suggest that they be included as part of the Draft Final Remedial Investigation.

If you have any questions, please call me at (415) 972-3029.

Sincerely,

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

Anna-Marie Cook  
Remedial Project Manager

enclosure

cc list next page

cc: Michael McClelland, SWDiv  
Sophia Serda, EPA  
Marcia Liao, DTSC  
Judy Huang, RWQCB  
Elizabeth Johnson, City of Alameda  
Lea Loizos, Arc Ecology  
Michael John Torrey, RAB Co-Chair  
Karla Brasaemle, TechLaw Inc

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## EPA Review of the Draft Remedial Investigation Report, Sites 14 and 15, Alameda Point

### GENERAL COMMENTS

1. The text describing the nature and extent of contamination is very brief and does not really describe the extent of contamination. For example, the text does not describe the fact that the concentration of some volatile organic compounds in groundwater has increased over time, and does not discuss the impact that the groundwater flow direction may have had on this increase in concentration. There is no discussion of whether the groundwater contamination observed in M101-A could have an upgradient source. Please expand the section describing the nature and extent of contamination and also discuss the potential impact of the groundwater flow direction on the observed groundwater contamination.
  2. The document does not follow the *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*, because the discussion of "Contaminant Fate and Transport," including contaminant persistence and contaminant migration is missing. This information should also be incorporated into the site conceptual models. Please include a discussion of Contaminant Fate and Transport when the document is revised.
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3. The issue of elevated detection limits is not addressed in the discussion of the nature and extent of contaminants. Detection limits are frequently elevated due to interferences, so it is important to indicate whether detection limits are elevated. Please state whether detection limits were elevated when discussing "non-detect" values (e.g., on page 4-5). Also, please clarify if non-detect refers to an actual detection limit or whether it refers to a value less than the reporting limit.
  4. In the Draft Final Remedial Investigation Report, please include the risk from ingestion of groundwater in the total risk calculations. Inclusion of this exposure pathway will give a baseline risk assessment for unrestricted use, from which any decisions on remediation measures, including institutional controls, can be made.

### SPECIFIC COMMENTS

1. **Section 2.3.2, Page 2-12, third paragraph:** Please revise the sentence to read "The Navy's Determination of Beneficial Uses of Groundwater report (Tetra Tech 2000b) discussed other factors that indicate that the Class II groundwater in the western region of Alameda Point should not be considered a potential drinking water source for CERCLA cleanup purposes."
2. **Section 2.5.1, Page 2-17, first paragraph:** If the sump had no drains or discharge points how was the runoff collected in the sump disposed of?

3. **Section 2.5.1, page 2-19, Building 528/GAP9:** It seems likely, based on past use of Building 528 as a vehicle maintenance shop and also the evidence of staining in the southwest corner of the building, that Building 528 may be the source of the VOC groundwater contamination at Site 14.
4. **Section 3.2.2, Page 3-12, first paragraph:** The dates given for the removal action at Site 15 contradicts the date stated in Section 2.5.2 and page 3-13. Please revise Section 3.2.2.
5. **Table 3-2:** Please clarify what the X on the tables means. Does it mean that only the samples with the X were analyzed for the particular suite of chemicals? Or that only samples with X showed a detect? Actual sample results, including non-detects, would be helpful.
6. **Section 4.1.2, Nature and Extent of Constituents in Soil and Groundwater in Relation to a Source, Page 4-3:** The text in the penultimate paragraph states that benzo(a)pyrene (BaP) equivalents “ranged from 13 to a maximum concentration of 1,082 ug/kg in soil...(location S14-DBS-DP-13),” however the maximum concentration of Figure 4-2 is 1,193 ug/kg at location S14-DGS-DP-14. Please resolve this discrepancy.

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7. **Section 4.1.2, Nature and Extent of Constituents in Soil and Groundwater in Relation to a Source, Page 4-3:** The BaP data is not compared to the preliminary remediation goal (PRG) or to another screening value, while arsenic, which is also discussed in this paragraph, is compared to the PRG. Please compare the BaP data to the PRG or to a site-specific screening level.
8. **Section 4.1.2, Nature and Extent of Constituents in Soil and Groundwater in Relation to a Source, Pages 4-3 and 4-4:** The purpose of the comparison of groundwater concentrations over time is unclear and data are not always discussed in chronological order. Please explain the reason for comparing the concentrations of chlorinated compounds in 1994-1995 with the maximum concentrations in 2001 (or in 1998 and 2001). Also, please present detections in chronological order.
9. **Section 4.1.2, Nature and Extent of Constituents in Soil and Groundwater in Relation to a Source, Pages 4-4 and 4-5 and Section 6.1, Site 14 Conclusions and Recommendations, Page 6-2:** The source of 1,1-dichloroethane (11-DCA), 1,2-dichloroethene (12-DCE) and vinyl chloride in monitoring well M101-A is not identified, but activities conducted in Building 26, located west of this well, included the use of solvents. Groundwater sampling between Building 26 and M101-A was limited to a grab sample from a single boring, S14-3-5, but there is no discussion of whether this boring was sampled from the same depth as the screened interval of M101-A. The log for this boring and the log and well construction diagram for well M101-A are not included in Appendix A, so the reader cannot evaluate whether the sampling results are from the

same lithologic unit. Please discuss the potential that the source of the chlorinated compounds detected in monitoring well M101-A is related to activities conducted in Building 26 and also discuss whether the groundwater sample from boring S14-3-5 was collected from the same depth as the screened interval of well M101-A.

- 10. Section 4.1.2, Nature and Extent of Constituents in Soil and Groundwater in Relation to a Source, Page 4-5, last paragraph:** The four sampling locations discussed in this paragraph, 013-002-006, 013-002-007, 013-002-008, and 013-002-009 do not appear on any of the figures in Sections 3 or 4, so it is unclear if these sampling points are in the vicinity of Buildings 120, 121, 122, and 388. Please include these locations on at least one figure.

#### **MINOR COMMENTS**

1. Page 4-19 was missing from the review copy. Please provide the missing page.
2. Sections 6.1 and 6.1.1 have titles that vary by only one letter. Please provide more unique titles.

**EPA Review of the Screening Ecological Risk Assessment, Draft Remedial Investigation Report, Sites 14 and 15, Alameda Point**

**GENERAL COMMENTS**

1. Section 5 (Section 5.3.4.2) and Appendix H state that, “frequency of detection, concentration, and absorption potential of the chemical to the endpoint were utilized to realistically evaluate risk, since a baseline ERA is not deemed appropriate for these sites,” but the basis for and intent of this statement is unclear as it does not appear that there is available data in the screening Ecological Risk Assessment (ERA) to “realistically evaluate risk.” A screening ERA is intended to determine whether site data indicates the potential for ecological risk at the site. At the end of Step 2 of the ecological risk assessment process, risk managers should be equipped with the information to determine whether or not the potential for risk exists (e.g., whether the site should proceed to a baseline ERA). The statement quoted above implies that a risk management decision was made prior to consideration of the results of the screening ERA (i.e., since the Navy decided not to conduct a baseline ERA, refinements were made in the risk characterization of the screening ERA to conclude that the sites did not pose the potential for risk). This statement should be removed from the text, or this section should be revised to state that the risk characterization includes a consideration of the factors listed in the text, and the results of the screening ERA indicate that the site does not pose the potential for risk. Section 1 of Appendix H states that a previous removal action has taken place at Site 15, but that site-specific ecological sampling has not been conducted at Sites 14 and 15, and that the screening ERAs in this report are “modified screening-level ERAs.” There is no information to describe what is meant by this statement, or to suggest that available data supports anything other than a screening ERA according to EPA guidance. Please review the screening ERA to consistently incorporate conservative assumptions in order to adhere to 1997 EPA ERA guidance for a screening ERA.
  
2. The process for selecting and evaluating chemicals of potential ecological concern (COPECs) at the groundwater-surface water interface does not reflect the conservative assumptions necessary for a screening-level ERA, and the presentation of the screening process for the effects of chemicals in surface water on aquatic receptors suggests an unfamiliarity with State of California regulations and the ERA process as outlined in 1997 EPA guidance. First, the screening ERA does not include surface water quality criteria promulgated for the State of California as screening criteria for chemicals that have the potential to impact San Francisco Bay. Second, the use of a dilution factor of 10 applied to concentrations of chemicals measured in groundwater to estimate risk to receptors in surface water in San Francisco Bay is not appropriate. The groundwater monitoring wells at Sites 14 and 15 range from more than 150 feet away from the shoreline to less than 60 feet away from the shoreline. The screening ERA does not

provide a discussion of whether the data groundwater data used in the screening are adequate to make risk management decisions or to eliminate chemicals from further consideration. Thus, it is not evident that a chemical of concern should be eliminated based solely on the arbitrary dilution factor of 10. Although the dilution factor provides a possible groundwater-to-surface water concentration, please revise the screening ERA tables and text to also include a comparison of the detected concentrations measured in groundwater to promulgated surface water criteria. The resulting information from both comparisons will provide a more representative range of possible impacts from groundwater discharging to the bay for consideration in risk management decision-making.

3. The method by which frequency of detection was used as a screening criteria and as a source of uncertainty in the risk characterization is unclear. For example, it appears that chemicals detected in fewer than 5% of samples were not selected as COPECs in the screening ERA. However, frequency of detection was also discussed in Section 5 as a source of uncertainty or a reason for not carrying a chemical forward to a baseline ERA. If a chemical was retained as a COPEC (i.e., detected in more than 5% of samples), it is not clear why frequency of detection is re-considered once chemicals have proceeded through the screening process. Please revise the document to clarify these issues.
4. The screening ERA does not consider all appropriate feeding guilds. For example, lower trophic-level organisms such as invertebrates and plants are listed in the conceptual site model, yet readily available screening benchmarks for terrestrial invertebrates and plants are not used to evaluate the potential for risk to these feeding guilds as assessment endpoints. Additionally, the report states that a one-acre area at Site 15 was designated as wetlands in a recent wetland delineation. It is unclear why the screening ERA for this site does not evaluate the potential for risk to wetland receptors that could use this area. Table H-1, Special Status Species– Plants, Fish, Reptiles, and Mammals, lists several ecological receptors that are likely more sensitive than the selected receptors of concern. Please revise the screening ERA for Site 15 to evaluate the potential for risk to terrestrial invertebrates and plants, and sensitive wetland receptors; alternatively, please revise the screening ERA to explain why it was not deemed necessary to evaluate the potential for risk to the most sensitive receptors that could occur at Sites 14 and 15.

#### **SPECIFIC COMMENTS, SECTION 5**

1. **Section 5.3.3, Exposure Estimates and Risk Evaluation, Page 5-18:** The text states that chemicals detected in groundwater and retained as COPECs “were not compared further because no valid saltwater screening values have been published for the ecological COPECs... these COPECs were qualitatively evaluated.” The basis for this statement is unclear, since Table 5-12 presents saltwater screening values and compares them to groundwater concentrations detected at Site 14. Please revise Section 5.3.4.1 to refer to the available saltwater screening values that were considered in the screening ERA, and

revise the screening ERA to include aquatic receptors as assessment endpoints and surface water quality criteria as measurement endpoints.

Also, the second paragraph of Section 5.3.3 refers to a description of the screening in Section 5.4.1. However, the document does not contain a Section 5.4.1. Please resolve this discrepancy.

2. **Table 5-13, Assessment and Measurement Endpoints:** Table 5-13 should be revised to include aquatic receptors as assessment endpoints, and surface water quality criteria as measurement endpoints. Also, the description of the measurement endpoints is vague. Please revise this column to indicate that literature-based low and high toxicity reference values (TRVs) are used to evaluate the potential for risk to the squirrel, sparrow, and hawk.
3. **Section 5.3.4.2, Site 15, Page 5-24:** The text states that the HQ for exposure of raptors to thallium based on the high (less conservative) TRV is greater than 1. Further, the text states that thallium was detected “in less than half” of the 42 samples collected, and concludes that thallium “poses low to no significant risk to avian receptors.” This conclusion seems to contradict the intent of a screening-level ERA. Based on the summary in this section and the information in Appendix H, it appears that thallium was detected above a known effects level and indicates the potential for risk. This section does not describe the concentrations at which thallium was detected in six samples from the site, or whether these samples were collected from a known or suspected source area or an area where a release may have occurred. However, it is evident in Figure 4-13, Soil Sampling Results for Thallium, that elevated thallium concentrations were detected in a localized area at Site 15 near Buildings 283 and 301; therefore, it appears that thallium concentrations driving ecological risk are potentially connected to a source area. Based on exceedance of a high TRV and knowledge of a potential source area where concentrations result in a dose exceeding the TRV, it appears that thallium poses the potential for risk to raptors at Site 15 in the vicinity of Buildings 283 and 301. Please revise the statement regarding low to no significant risk to raptors to explain that thallium concentrations in a localized area at Site 15 poses the potential for risk, based on available data and the high (less conservative) TRV indicating a threshold for effects.
4. **Table 5-12: Site 14 Results of the Ecological Constituent of Potential Concern Screening Process- Groundwater:** The table refers to “ambient water quality criteria,” but does not provide a specific reference to the criteria listed in the table. It appears that the table lists the National Ambient Water Quality Criteria (NAWQC) published in 1999. However, the Navy should first consider the promulgated criteria specific to the waters of the State of California (California Toxics Rule, 2000). Please revise Table 5-12 to compare detected concentrations in groundwater to the appropriate State of California surface water criteria.

Additionally, it is unclear how “statistical background” was determined for surface water concentrations. It appears that several chemicals should have been retained in the screening ERA because the maximum detected concentration exceeded the appropriate screening benchmark. Specifically, copper was detected at a concentration two orders of magnitude higher than the screening criterion. Since it appears that copper poses the potential for risk to aquatic organisms, and since the State of California standard for copper in the waters of San Francisco Bay is more stringent than the NAWQC, copper should be retained as a COPEC in groundwater/surface water. Please revise Section 5 to address the procedure by which background concentrations were determined for surface water. Additionally, the screening ERA should retain as a COPEC any chemical detected above the State of California promulgated surface water screening criteria.

## **SPECIFIC COMMENTS: APPENDIX H**

5. **Section 1.2.1.2, Identification of Ecological Chemicals of Potential Concern in Groundwater, Page H-4, and Figure H-3, Decision Tree for Ecological COPC Selection for Groundwater:** The process for selecting ecological COPCs for groundwater and the presentation of the screening for aquatic receptors is not reflective of the conservative assumptions typically used in the screening ERA process and suggests an unfamiliarity with State of California regulations. The process does not reflect the approach for screening level ERAs as outlined in 1997 EPA guidance for the following reasons. First, the surface water quality criteria promulgated for the State of California were not used as screening criteria for chemicals that have the potential to impact San Francisco Bay. Second, the text on page H-4 states that when a chronic criterion was not available, the acute effect concentration was used instead. The use of an acute effect concentration is not appropriate in a screening ERA. Please adjust the acute effect concentration to a more conservative chronic concentration using an uncertainty factor, as outlined in 1997 EPA ERA guidance.

In addition, the application of a dilution factor of 10 for comparison to surface water screening criteria may not reflect the conservative assumptions necessary in a screening ERA. The text on Page H-25 states that exposure to surface water is considered a complete pathway for Site 14 based on “potential water quality impacts at Oakland Inner Harbor”. Based on figures in Section 4, the monitoring wells at Sites 14 and 15 range from more than 150 feet away from the shoreline to less than 60 feet away from the shoreline. The screening ERA does not discuss whether the groundwater data used in the screening are adequate to make risk management decisions or represent worst case exposures for aquatic organisms in surface water. While it is recognized that NOAA recommends a dilution factor of 10 for screening purposes, it is not evident that the available groundwater data represent the worst case scenario for consideration in the screening ERA. Please revise the report to present the potential upper bound estimate (i.e., maximum detected concentration in groundwater compared to promulgated water quality criteria) to support risk management decision-making regarding potential

discharges to San Francisco Bay.

6. **Section 1.2.1.2, Identification of Ecological Chemicals of Potential Concern in Groundwater, Page H-5:** Step 7 indicates that if the diluted maximum detected concentration exceeds its corresponding water quality criteria, then the 95 UCL will be divided by 10 and used as the exposure point concentration for comparison to a chronic and acute water quality criteria. However, the use of the UCL does not reflect the intent of the screening level ERA which is to identify chemicals and locations which may reflect a potential for exposures and risk. The process for selecting COPECs for surface water should be revised to be consistent with the conservative approach outlined in 1997 EPA ERA guidance (e.g., comparison of the maximum detected concentration to the most conservative chronic screening benchmark). Please include a discussion of the uncertainties associated with comparing measured groundwater concentrations to surface water screening criteria in the screening ERA. Please also provide a more detailed evaluation of the adequacy of the data set to provide representative worst-case exposures in the revised report. The evaluation should include a discussion of whether monitoring well locations are representative of possible discharges to the Bay based on expected groundwater to surface water contaminant migration pathways.

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7. **Section 1.2.2.4, Development of Toxicity Reference Values for Soil, Page H-10:** The description of the high and low TRVs is not consistent with the cited Navy/Region 9 BTAG document describing the development of these TRVs. The text states, "the high TRV represents the lowest observable effects level, while the low TRV represents the no observable effects level." Please delete this text and replace it with a statement that reflects the following: "The low TRV is a conservative screening value consistent with a chronic no effect level; the high TRV is a less conservative value consistent with an effect level, at which a specific biological effect was observed in a laboratory test organism. Hence, the high TRV is a value at which the potential for adverse effects exists."
8. **Section 1.2.2.6, Selection of Assessment and Measurement Endpoints, Page H-12:** The text does not describe the assessment and measurement endpoints used in consideration of aquatic receptors in the screening ERA. This section and Table H-11 should be revised to include aquatic receptors as assessment endpoints, and surface water quality criteria as measurement endpoints.

Specifically, the selection of assessment endpoints does not include all appropriate feeding guilds. For example, lower trophic-level organisms such as invertebrates and plants are listed in the conceptual site model, yet readily available soil screening benchmarks for terrestrial invertebrates and plants (i.e., those published by Oak Ridge National Laboratory) are not used to evaluate the potential for risk to these feeding guilds as assessment endpoints. Please revise the screening ERA to compare chemical concentrations to available benchmarks for these feeding guilds.

Finally, based on the information presented in Section 1.2.2.1, Evaluation of Environmental Setting and Chemicals, and Section 2.2.1.1, Environmental Setting and Contaminants for Site 15, a one-acre area at Site 15 was designated as wetlands in a recent wetland delineation. It is unclear why the screening ERA for this site does not evaluate the potential for risk to wetland receptors that could potentially use the wetland area. For example, Table H-1, Special Status Species—Plants, Fish, Reptiles, and Mammals, lists three threatened or endangered small mammals with body weights lower than the body weight of the California ground squirrel (which is the only small mammal evaluated in the screening ERA). Please revise the screening ERA for Site 15 to evaluate the potential for risk to sensitive wetland receptors. If sensitive wetland receptors are not selected as receptors of concern, please also revise the measurement endpoints for the mammal and bird receptors to indicate that protection of these groups on an individual level is the goal (to be protective of special status species).

9. **Table H-11, Assessment and Measurement Endpoints:** The table should be revised to include aquatic receptors as assessment endpoints, and surface water quality criteria as measurement endpoints. Additionally, the description of the measurement endpoints is vague. This column should be revised to indicate that literature-based low and high toxicity reference values (TRVs) are used to evaluate the potential for risk to the squirrel, sparrow, and hawk.

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10. **Section 1.2.3.1, Development of Exposure Estimates, Page H-15:** The exposure estimates were based on the average body weight for receptors of concern. This procedure is not consistent with 1997 EPA ERA guidance, which requires that screening-level dose estimates be calculated using the most conservative exposure parameters (e.g., minimum body weight, maximum ingestion rate). Please revise the dose estimates to use the most conservative exposure parameters.

11. **Section 1.2.3.1, Development of Exposure Estimates, Pages H-17 to H-18:** The process by which doses were calculated for small mammal, passerine, and raptor receptors does not follow 1997 EPA ERA guidance for the following reasons. First, the doses for the squirrel and sparrow are calculated using multiple food items. Under 1997 EPA ERA guidance, the dose calculation should assume ingestion of 100% of the most contaminated food item. Also, the procedure for estimating the hawk dose is unclear. Based on the second bullet item on page H-18, it appears that the concentration in the hawk's food (the squirrel) was calculated by multiplying the exposure point concentration by the squirrel's average age. The technical basis for this approach is not evident. The bioaccumulation factor for small mammals should be calculated using available transfer factors from the literature that consider a Kow-based model (e.g., Travis and Arms 1988; EPA, Screening Level Ecological Risk Assessment Protocol for Hazardous Waste Combustion Facilities, 1999; or Draft Eco-SSL guidance, 2000). Please revise the report to list the bioaccumulation factors assumed in the calculation of the dose to raptors.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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MEMORANDUM

To: Anna Marie Cook (H-8-3)  
Remedial Project Manager

From: Dr. Sophia Serda (H-9-3)   
Regional Toxicologist

Subject: Draft Remedial Investigation for IR Sites 14 and 15, Alameda Point, August 2002.

Date: October 5, 2002

I have reviewed the above referenced document with a focus on the human health risk assessment. A human health risk assessment calculates the cancer and noncancer risk due to exposure. The calculated risks are not likely to be exceeded by any member of the exposed population under maximum exposure conditions and actual risks may be zero. A risk assessment cannot identify who within an exposed community may or may not become ill due to exposure to toxic agents; nor can a risk assessment be used to associate a particular illness with a particular toxic agent. A risk assessment is best used as a predictive tool to identify those circumstances under which exposure to a toxic agent may potentially lead to unacceptable health outcomes. This information can then in turn be used to select options that will reduce or remove the community's exposure to the toxic agent.

General Comments

1. Exposure Point Concentrations

Exposure point concentrations for Site 14 found in Tables D.7.1-4 - D.7.1-6 and for Site 15 in Tables D.7.2-3 - D.7.2-4. **could not** be checked for accuracy. Provide information to allow the technical reviewer to verify by independent calculation the 95 percent UCLs used in the risk assessment are correct.

Also, the calculation of the 95 percent UCLs are dependant on the underlying distribution of data. What statistical test was conducted to support the assumption the organic chemical distributions are log normal?

2. Toxicity Information

Future risk assessments conducted at Alameda must use the revised or new toxicity information for several chemical found in the Region 9 PRGs Tables 2002 Update . This information affects the data analysis for some of the volatile organic compounds found in Tables 4.1 - 4.4 and the risk numbers.

### 3. Background Comparison

The background comparison found in Section 5.1 of the Risk Assessment would be better presented as part of Section 4, Nature and Extent .

### 4. Future Monitoring

Any future buildings built on Site 14 and Site 15 should be monitored to ensure no volatile organic compounds from soil or groundwater are impacting indoor air.

#### Specific Comments

#### 1. Appendix D, Figure D.5- 3 Conceptual Model Recreational Receptors

Identify ingestion of fish would be possible for the recreational pathway.

#### 2. Appendix D, References

Reference the "Human Health Risk Assessment Work Plan" used to prepare this risk assessment.

#### 3. Section 5.2.1, Page 5-7.

This Section states Site 14 removal action data were used for dioxin. However, in Appendix D, Human Health Risk Assessment , Table D.7.1-1 identifies the maximum concentration for dioxin TEQ as 0.054 ug/kg and Section 4.1.2, Page 4-3 and Figure 4-1 show after the removal action was complete for Site 14 "the dioxin toxicity equivalent for the confirmation samples ranged from 0.000011 to 0.0124 ug/kg". Clarify, which dioxin data was used in the risk assessment for Site 14? Recommend post removal data be used in the assessment for Site 14.

#### 4. Section 6.2, Site 15

Provide Total Risk for 0-2 feet

#### 5. Section 6.1.1, Site 14

Provide Total Risk for 0-2 feet

If you have any questions regarding my comments I can be reached at (415) 972- 3027.