



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
SFD 8-3

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ALAMEDA POINT
SSIC NO. 5090.3

March 31, 2005

Thomas Macchiarella
BRAC Operations, Code 06CA.TM
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

RE: Draft Final Feasibility Study Report Installation Restoration Site 26, Alameda Point

Dear Mr. Macchiarella:

We have reviewed the Draft Final Feasibility Study for Site 26, Alameda Point and have concluded that the Study contains a sufficient evaluation of various remedial alternatives, covering an adequate range of proposed RAOs, to go final. However, we disagree with portions of the document and would not be able to concur in a Proposed Plan or ROD that contains the RAOs set forth in the FS for the inhalation pathway, or that selects some of the remedial alternatives in the FS, as discussed below.

EPA's primary concern is that the proposed RAOs for the inhalation pathway are based on risks calculated using an exposure point concentration that essentially averages the concentration over the entire plume. This greatly underestimates the risk for the most contaminated areas. For example, even though the highest hit of vinyl chloride is 18 $\mu\text{g/l}$, the risk for inhalation of vinyl chloride is derived from a concentration of 3.5 $\mu\text{g/l}$. Rather than the risk numbers calculated by the Navy, we believe that in the areas of the plume with the highest concentrations of both TCE and vinyl chloride, the risks lie in the middle to upper end of the risk management range for the industrial scenario, and over the upper limit for the residential scenario according to our calculations and the guidance provided from the CalEPA (Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties, January 2005). In the worst case scenario, in which all contaminant products in the groundwater degrade to vinyl chloride, the inhalation risk would be even higher, by a substantial amount, in these high concentration areas. The RAOs should be reevaluated, both in light of the new CalEPA guidance and also factoring in the exposure from these high concentration areas of the plume. This needs to be done prior to issuance of the Proposed Plan so that the risks and the effectiveness of the various remedial alternatives can be appropriately analyzed during the remedy selection process.

We have additional concerns regarding the remedial alternatives, which we have discussed in our recent telephone conversations. First, any remedy that does not result in groundwater concentrations being remediated to MCLs needs to include institutional controls to protect against consumption of the groundwater. It may be necessary for the ICs to prohibit residential use of the property, as we have urged at other sites, although at Site 26 it may also be possible to fashion a remedy under which residential use of the property can be allowed if the groundwater is remediated to PRGs that adequately address both the inhalation and the accidental ingestion pathway. While we continue to believe that MCLs should be included as ARARs for this Class II groundwater, we may be willing to agree to disagree in a ROD if adequate groundwater cleanup takes place. Second, we remain concerned with the Navy's inclusion of "groundwater confirmation sampling" (i.e. monitoring) as a stand-alone remedial action alternative. Since monitoring by itself does not prevent or minimize a release, it does not meet the CERCLA definition of remedial action, although CERCLA clearly includes monitoring as a component of a remedial action. And regarding Site 26, as we have discussed, even if monitoring were considered to be a legitimate stand-alone remedial action, it would not be appropriate for this site because existing concentrations need to be reduced to adequately address the inhalation pathway, and because groundwater contamination in excess of MCLs cannot be left in place without at the very least ICs to prevent consumption of the groundwater.

In order to address our concerns regarding both the inhalation pathway and any potential ingestion pathway, we urge the Navy to 1) select an active remedy to clean up the highest contaminant concentration areas in the groundwater plume and 2) also select land use controls prohibiting use of groundwater at this site until MCLs are met and prohibiting residential use of the property until RAO's protective of the residential indoor inhalation pathway are met in groundwater.

Finally, EPA reiterates our request for a baseline risk assessment to be included as part of every Remedial Investigation and Feasibility Study. EPA believes the baseline risk assessment should include, in addition to other exposure pathways, ingestion of groundwater at all sites overlying a Class II aquifer. This calculation allows us to determine whether land use controls prohibiting use of groundwater and/or residential use of the property are necessary.

We recognize that the FS process at Site 26 has been protracted, and we appreciate the Navy's efforts to move expeditiously toward the Proposed Plan stage. We look forward to our discussion of Proposed Plan issues on April 12 and fully expect that we will be able to work together to select a reasonable, protective remedy for this site.

Sincerely,



Anna-Marie Cook
Remedial Project Manager

cc list next page

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