



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

December 18, 2004

Mr. Darren Newton
Department of the Navy
Program Management Office West
1230 Columbus Street, Suite 1100
San Diego, CA 92101-8571

Dear Darren:

Subject: EPA Comments on the Draft Proposed Plan for the Skeet Range at Alameda Point.

EPA has reviewed the Proposed Plan for the Skeet Range at Alameda Point and we concur with the Navy's proposal of No Further Action at this site. We do not expect the lead shot to pose an unacceptable risk to diving birds nor other ecological receptors. In addition, the shot does not pose a threat to human health.

The document is generally well written and effective. We do have the following comments on the text of the document.

1. In the future, please send the text draft before putting it in lay-out. This is an important issue that our community involvement coordinators raise with almost every proposed plan. They want to comment on the text before the layout starts to make modifications difficult.
2. The order of presentation at the beginning does not encourage public participation. The current first sentence is a bit too full of information, but the comment invitation isn't until the third paragraph. Also, the current first paragraph is loaded with acronyms that readers will likely not be able to remember as they read further. This first paragraph could begin something like:

"The US Navy encourages the public to comment on its Proposed Plan for no further action at the Alameda NAS Skeet Range (IR Site 29). The public comment period... The public meeting to receive written and verbal comments is..."

A second paragraph could contain the references to the RI, i.e., "...the Navy looked extensively at the contaminants, their location and their potential affect on plant, animals and humans in a study called a remedial investigation (RI)."

3. Some phrasing in the second paragraph does not encourage public participation: "...BRAC Cleanup Team...has determined through consultation with F&W..." This is pre-decisional language. The above sentence is also quite long (11 lines long).
4. Regarding the map, there are two yellow boxes on the western boundary that are confusing, since they have nothing to do with this proposed action. Instead, please highlight the Skeet Range.
5. There is a small formatting issue on Page 2, where the last line of the sentence seems to get lost on the second column.
6. The discussion of ecological risk assessment on pages 3 and 4 is confusing. The difference between screening and base-line risk assessments is difficult to present in a short proposed plan, and a probability distribution model is almost impossible to explain. Perhaps retain paragraphs 1 through 4, but change paragraph 5 to: "Models which took into account the field collected lead shot data, the NOAEL and exposure factors such as the amount of time that a bird spends at the site predict that an unacceptable risk is not posed to diving birds at this site". The rest of this section (except for the italicized conclusion) could then be deleted.
7. On Page 5, there is a reference to the documents being at the information repositories. Please add "(see locations listed on Page 1)".
8. The public meeting date should be held well after the holiday season is over.
9. The first page headline in red font does not encourage public participation. Although it does not use explicit pre-decisional language (instead it uses "indicate"), it does potentially send a similar message. Something like "Navy Proposes No Further Action at Skeet Range" or "Navy Comment Period Begins for Skeet Range" are possibilities.
10. The document states in a couple places that the conditions at the site do not present "a significant risk." More appropriate language based on EPA's ROD guidance is whether a site presents "an unacceptable risk".
11. The human health risk assessment section concludes that: "Risks along the adjacent shoreline are comparable to background". If this is also an acceptable risk, then please add a statement to that affect.

Please call me at (415) 972-3028 if you would like to discuss our comments on the Proposed Plan.

Sincerely,

Mark Ripperda
Remedial Project Manager