



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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SFD 8-3

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DIRECTOR'S OFFICE

April 20, 2006

Mr. Thomas Macchiarella, Code 06CA.TM
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

**RE: Draft Final Feasibility Study Report Installation Restoration Site 27, Dock Zone,
Alameda Point**

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document prepared by Bechtel Environmental, Inc and submitted to the regulators on March 24, 2006. Although we are willing to concur on this Feasibility Study and let the document go final, we are including in our letter some concerns that need to be addressed in both the Proposed Plan and the Record of Decision documents, and a few items for which we would like replacement pages for the Final Feasibility Study.

We stand by our comment made in the draft document that all alternatives with the exception of Alternative 6B are unreasonably long in duration, and encourage the Navy to select Alternative 6B as the preferred alternative for the Proposed Plan.

In the Proposed Plan and the Record of Decision, more support and clearer reasoning should be given for the decision to take no action for the shoreline groundwater. Specifically, the ROD should include the numbers to show that the ARARs (CTR) are already being attained for the shoreline groundwater, and additional/replacement pages for the FS with this information would be helpful. Also in the PP and ROD, each remedial alternative should be described as "no action for shoreline groundwater; MNA, ICs and/or ISCO, etc., for inland groundwater." We would also like to see a replacement page for the FS Executive Summary stating that each remedial alternative includes no action for shoreline groundwater.

The Navy's response to EPA's comment that the bulkhead had to be a component of a remedy could be more satisfactorily presented. The reasoning should be: The shoreline groundwater presents no immediate threat to the surface water body when comparing shoreline groundwater

concentrations to CTR values. The inland groundwater VOC contamination will be remediated to RGs by the time the bulkhead no longer functions as a barrier (another reason to choose the short duration Alternative 6B). Once groundwater is at MCLs, the VOCs will no longer be at sufficient concentrations to present a threat to the surface water body and the functionality of the bulkhead will be irrelevant.

EPA continues to disagree with the Navy's approach to "rating" the balancing criteria. While we are not requesting change pages in the FS on these issues, we are raising them now to facilitate preparation of the PP, ROD, and FSs on other sites. In our comments, we recommended omitting the summary comparison of the alternatives (e.g., on page ES-7, last paragraph) because it is not entirely appropriate, not explained, and misleading. The RTC to our comment on this topic cites that a comparison is required by 40 CFR 300.430(e)(9)(i) and (iii). However, these sections of the regulation say that there needs to be a detailed analysis of the alternatives and that the nine criteria should be used, not that there has to be a total comparative rating. Our preference is to have the Navy perform the type of analysis that was done for Site 14, which did not include a numeric rating. We dislike the apparently numeric comparison for the following reasons: 1) The total rating/ranking gives false precision. The nine criteria don't lend themselves well to quantification, and sometimes the sub-factors go in different directions. (For example, more active remedies almost always involve more impacts on workers and the community in the short term than ICs or MNA, yet they also achieve remedial goals sooner -- so does that give them a "low" or a "high" in terms of short-term effectiveness?); 2) It is not explained how the alternatives get the total rating. In the Site 27 FS, we are surmising that a 3 is given for each "high," a 2 for each "medium" and a 1 for each "low", and then they are summed. At a minimum, the approach should be clearly explained, although we would prefer it not be used; 3) We are assuming that when the total "score" is calculated, equal weight is given to each criterion. This isn't necessarily the most appropriate approach. When selecting a remedy, one needs to consider all the nine criteria, but one does not need to weigh them equally. For example, CERCLA and EPA regulations discuss various preferences (40 CFR 300.430(f)(1)(D) and (E)); 4) If the selected remedy is one with a low total score, then having included a general paragraph with the summary ratings could result in discrediting the remedy; 5) For the Site 27 FS, we continue to disagree with how the alternatives are rated in terms of certain criteria, and that, of course, is magnified when a total "score" is calculated and compared.

Elaborating on our concern with issue (5) above, we find the evaluation of the following criteria problematic:

a. Short-term effectiveness: The Navy's analysis seems to indicate that all that is needed is temporary ICs "to achieve protection", which means that the least active remedy (after no action) always gets the highest rating for this criterion. We disagree with the Navy's interpretation of "amount of time required before protection is achieved." EPA's FS guidance (OSWER 9355.3-01), p. 6-9 and 6-10, says that this criterion includes a factor for "time until remedial response objectives are achieved." Also, EPA's ROD guidance, p. 6-37, includes a sample analysis that looks at "time until action is complete." Thus, the "amount of time before protection is achieved" means the amount of time necessary to complete the remedy and achieve remedial goals -- not the amount of time it takes to install temporary ICs. This FS itself on page 6-4 defines short-term as "until RAOs are achieved."

b. Cost: Our recommendation was that the Navy take into consideration total cost of each alternative, as well as net present value (NPV). In response, the Navy quoted the NCP at 40 CFR 300.430(e)(9)(G). However, this regulation states that the types of costs that should be assessed include capital costs, annual O&M costs, and NPV costs – not that only NPV should be considered. This is another criterion that doesn't lend itself to a single total summary rating, because, as here, total cost and NPV don't necessarily come out the same. It would be helpful if the Navy would add a sentence that Alt. 6B has the lowest total cost.

c. Long-term effectiveness: It's not clear how the Navy is evaluating this criterion. The discussion on page 7-3 suggests that an important factor is length of time ICs would be needed, although alternatives that need ICs for 60 and 45 years receive "high" ratings. Again, the summary ratings suggest much more precision than they should.

d. Implementability and Alt. 3 -- Alt. 3 is rated high here because MNA is easy to monitor, but there is no discussion of how easy it is to monitor a "don't drink" IC.

We appreciate your attention to our concerns and anticipate that our comments will be factored into the preparation of the Proposed Plan and Record of Decision. We look forward to working together as we move toward Remedial Action for this site. Please call me at (415) 972-3029 if you have any questions.

Sincerely,



Anna-Marie Cook
Remedial Project Manager

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