



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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N00236.002421  
ALAMEDA POINT  
SSIC NO. 5090.3

May 24, 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 Remedial Investigation Report for IR Site 27, Dock Zone, Alameda Point**

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document, prepared by Bechtel Environmental, Inc, and submitted by the Navy to EPA on March 24, 2005. The Remedial Investigation Report is well written and nicely organized and presented, and the Executive Summary is outstanding. We believe that there are a few data gaps in the information presented, which we have included in our comments on the document, but we also feel that these gaps do not change the overall conclusions and recommendations presented in the report.

Most of the comments are requests for clarification, further explanation, or resolution of minor discrepancies within the document. Please call me at (415) 972-3029 if you would like to discuss the comments further.

Sincerely,

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

Anna-Marie Cook

enclosure

cc list: Jennifer Stewart, SWDiv  
Marcia Liao, DTSC  
Judy Huang, RWQCB  
Elizabeth Johnson, City of Alameda  
Peter Russell, Russell Resources Inc  
Jean Sweeney, RAB Co-Chair  
Karla Brasaemle, TechLaw Inc

**EPA Review of the Draft Remedial Investigation Report IR Site 27, Dock Zone  
Alameda Point**

**GENERAL COMMENTS:**

1. The Executive Summary is excellent. It summarizes the document to the extent that a reader has a good understanding of the content of the Remedial Investigation Report, including conceptual site model, sampling results, risk assessments and conclusions without reading the entire document. We really appreciate the effort put into making this Executive Summary exemplary.
2. The field work has been thorough in investigating most aspects of potential contamination. There are, however, a few data gaps that emerge in reviewing the information presented in the document. EPA does not believe these data gaps are sufficiently problematic that they change the conclusions of the RI or significantly impact the scope of the FS. However, the gaps should be addressed in the Remedial Design/Remedial Action phase of the IR 27 project. Specifically, PCB samples should be collected in the area with the oily stain near the electrical substation (Building 555). The Navy should also verify whether wipe or soil samples were collected in the vicinity of all transformers within the extended site boundaries. In addition, soil and groundwater samples beneath and adjacent to OWS-166A and OWS-166B and in WD-166 need to be taken to verify that these SWMUs are not a past and/or continuing source of contamination to soil and groundwater.
3. In Section 4, specifically Section 4.2.3.3, numeric values for the California criteria continuing concentration (CCC) and for the background 95<sup>th</sup> UCL for each metal discussed should be provided to give the reader a complete understanding of what the sampling results are being compared to.

**SPECIFIC COMMENTS:**

1. **Section 1.3.1, Regulatory Framework, Page 1-3, Fourth Paragraph:** The text states that Alameda Point is on the United States Environmental Protection Agency (U.S. EPA) National Priority List but does not state the date when Alameda Point was placed on the list. Please state in the text when Alameda Point was placed on the U.S. EPA National Priority List.
2. **Section 1.3.3, Site Description and Current and Past Operations, Pages 1-5 though 1-7:** This section describes the buildings and structures that are present in both the original and expanded Installation Restoration (IR) Site 27 boundaries, however, some features are not discussed. The features that are not discussed in this section are the bilge oily water treatment system (BOWTS) in Parcel 155, vehicle wash-down area in Parcel

201, satellite hazardous waste accumulation point (SHWAP) in Parcel 139 and removed Building 182 in Parcel 139. Also not discussed in this section or in Section 1 but shown in Figure 1-3 are seven buildings or structures that have been removed. All are located inside the expanded boundary. Five former structures were located just east of the original boundary in the southwestern portion of Parcel 139. Two former structures were in Parcel 154 south of the southeastern corner of the original boundary. Please discuss the historic use of these former structures.

3. **Section 1.3.3, Site Description and Current and Past Operations, Pages 1-7:** The third full paragraph describes the open space between Building 168 and the original eastern boundary of IR Site 27, but does not provide sufficient information about the historical uses of this area. The text states that the site served as an aircraft parking area and directs the reader to Figures A-3 and A-5. The text also states “the open area is currently paved with concrete and asphalt.” It is unclear when the area was paved with concrete or asphalt and whether a site investigation was performed prior to installation of pavement. Further, in Figure A-3 it is unclear whether there were stained soils or paving in the open area to the southeast where aircraft were parked on a dark area. Please provide a more detailed discussion of the historic uses of this open area and state when it was paved with concrete and asphalt.
4. **Section 1.3.4.2, UST 15 Investigation, Page 1-10:** The fourth paragraph gives a brief summary of the groundwater contamination in the vicinity of the former underground storage tanks (USTs) 15-1, 15-2, and 15-3, however, there is no summary for the soil that was sampled from 1995 to 2000 in the same vicinity. Please provide a brief summary of the soil contamination or lack of soil contamination around USTs 15-1, 15-2, and 15-3 from samples collected from 1995 to 2000.
5. **Section 1.3.4.2, UST 37 Investigation, Page 1-11:** The second paragraph discusses sampling and the sampling results of the excavation of USTs 37-13 through 37-16 but the text does not provide references for the source of the information presented in this section. Please provide references for the source of the information in this section.
6. **Section 1.3.4.2, UST 37 Investigation, Page 1-11:** The first paragraph states that soil and groundwater sampling was conducted in 1997, but the text only discusses soil sample analyses and results. The text does not discuss discrete groundwater sample analyses or results. This information is needed to help understand the history of the groundwater contamination or lack of groundwater contamination in the vicinity of UST 37. Please revise the text to include a discussion of the discrete groundwater samples analyses and results for the 1997 investigation.
7. **Section 1.3.4.3, Environmental Baseline Survey Investigations:** Throughout this section, the text states that data concentrations were screened against the August 1996 PRGs, but it is unclear whether this data has also been screened against the 2004 PRGs or

against residential PRGs since mixed use includes residential reuse. Please state whether the data has been screened against the 2004 PRGs, and if not, please screen the data against the more recent PRGs and discuss samples with analytes that exceed the 2004 residential PRGs.

8. **EBS Parcel 138, Page 1-13:** The third paragraph discusses the Phase 2B analytical results for soil around the rail line in Parcel 138, but the text does not discuss the analytical results for metals or for the groundwater sample (138-0028). This information is necessary to understand the history of possible contamination in Parcel 138. Please revise the text to include a discussion of the metals results from the Phase 2B soil samples and the analytical results from the groundwater sample collected in the vicinity of the rail line in Parcel 138.
9. **Page 1-18, EBS Parcel 154:** It is not clear why only the northern portion of EBS Parcel 154 is included in IR 27, when it is known that the Navy used Buildings 166 and 167 as aircraft maintenance hangers. Typically, such activities use VOCs which often then become the source of groundwater contamination. It seems an oversight not to include Buildings 166 and 167 and the associated OWSs from the wash down area in the RI investigation.
10. **Section 1.3.4.3, EBS Parcel 154, Page 1-19:** It is unclear why samples collected from the area of a dark oily stain that appeared to come from two drums in the fenced compound containing Building 555, an electrical substation, were not analyzed for PCBs. This is a data gap and should be identified as one in the text of this section and in the conclusions in Section 7.
11. **Section 1.3.4.4, Fuel Line Investigations, Pages 1-24 and 1-25:** The text of the last paragraph on page 1-24 which carries over to page 1-25 discusses soil samples within the expanded boundaries of IR Site 27 where contamination remains, however, the specific sample locations are not evident from the information provided. In addition, the location of the five groundwater samples collected in the Fuel Pipeline Removal Area 4 are not evident from Figure 1-10 or the text. Please show the soil sample locations on Figure 1-10 and specify the soil sample locations that are within the expanded boundaries of IR Site 27, that contained detectable concentrations of contaminants (8 soil samples), contained total petroleum hydrocarbons (TPH) concentrations exceeding 100 mg/kg (6 soil samples), and contained low concentrations of benzene, toluene, ethylbenzene, and xylenes (BTEX) (3 soil samples). Please show the groundwater sample locations in Figure 1-10 and list the groundwater sample locations in the text that are within the expanded boundaries of IR Site 27.
12. **Page 1-29, Section 1.3.5.4:** EPA cannot support the recommendation for NFA for the OWSs and the WD area at Building 166 without being provided with information on sampling analyses and results. Were soil and groundwater samples taken in the vicinity

of the OWSs and the WD area? Were VOCs and metals analyzed for in addition to BTEX and TPH analyses?

13. **Figure 2-6, Geologic Cross Section C-C' and Figure 2-7, Geologic Cross Section D-D'**: The water levels shown on these figures do not match those on the boring logs, so the source of this information is unclear. Please reference the source used to determine water table elevations in the Legend.
14. **Section 3, Investigation Approach and Scope, Page 3-1**: In the second paragraph there are two sentences that state in which appendixes the "relevant analytical data" is presented, but the significance of this phrase is not defined. The word "relevant" implies that not all of the analytical data is being used. Please state in the text what is meant by "Relevant analytical data," i.e. what analytical data is or is not being used and why.
15. **Section 3.2, Remedial Investigation Sampling Locations, Analyses, and Rationale, Page 3-4**: The basis for concluding that copper, lead, and thallium are the only metals that are considered contaminants of potential concern (COPCs) is not stated. Figure 3-1 appears to indicate that 2002 PRGs were used, but 2004 PRGs issued in October 2004 should have been used for this evaluation. Please state the criteria used to determine which metals are COPCs.
16. **Section 3.2.1.3, Phase I Groundwater Sampling, Page 3-5**: The first paragraph states six preexisting (prior to the RI) monitoring wells were sampled, but the identifiers of the six monitoring wells are not provided. Please provide the identifiers for the six preexisting monitoring wells in the text.
17. **Section 3.2.3.1, Phase III Discrete Groundwater Sampling, Pages 3-7 and 3-8**: The last paragraph on page 3-7 states that groundwater samples were collected from 24 temporary well point locations which are shown in Figure 3-3, but the text does not specify the corresponding boring numbers. The boring numbers of the 24 temporary well point locations would help the reader to locate them on Figure 3-3. Please provide the boring numbers for the 24 temporary well point locations in the text.
18. **Page 3-8, fourth full paragraph, last sentence**: Please clarify whether the third round sampling indicated a need for further step-outs at only shallow depths in groundwater. In other words, what did the two 20 feet bgs samples show in the third round sampling?
19. **Section 3.2.3.2, Phase III Monitoring Well Sampling, Page 3-9**: Paragraphs four and six duplicate the information that three preexisting monitoring wells were decommissioned. Please delete one of these paragraphs and also explain why the wells were decommissioned.

20. **Page 3-10, Section 3.2.4.1:** Please elaborate on the validity of using soil gas measurements when the water table is so high. At IR 30, soil gas was deemed invalid to assess indoor air pathways due to the shallowness of the water table and it would be helpful to have a discussion of how this problem potentially affects assessment of the indoor air pathway for IR 27.
21. **Section 3.3.2.3, Basewide Groundwater Monitoring Program Well Sampling, Page 3-22:** The first paragraph states that four monitoring wells were sampled as part of the basewide groundwater monitoring program (BGMP) in 2002, but does not specify which wells were included in the BGMP. In the text, please specify the four monitoring well that were sampled as part of the BGMP in 2002.
22. **Section 4.1.2.6, Inorganic Analytes, Page 4-6:** It is unclear why the text states that EBS metals data was not validated, and then states that “all analytical results for iron and thallium that exceed regulatory criteria are validated and verified data.” Based on this statement and on Figure 4-5, it appears that EBS data for arsenic, iron, and thallium were validated, so it is unclear why the rest of the EBS metals data was not also validated. Please validate all of the EBS metals data and discuss the analytical results or explain why only some of the EBS metals data can be validated.
23. **Section 4.1.3.1, Volatile Organic Compounds, Halogenated VOCs, Page 4-8:** Clarification is needed in the second paragraph, first sentence, where the text states “In the western portion of IR Site 27, all four of these VOCs were reported,” since six VOCs are discussed in the preceding paragraph. Please list the specific VOCs in the text.
24. **Section 4.2.3.1, Volatile Organic Compounds, Benzene; 1,2,4-Trimethylbenzene; and 1,3,5-Trimethylbenzene, Page 4-18:** In the fourth paragraph there appears to be a misprint for the concentration of 1,3,5-Trimethylbenzene in one discrete groundwater sample. The text has “1,3,5-Trimethylbenzene (0.19 ug/L)”, but Table 4-4 indicates that the maximum concentration was 120 micrograms per liter (ug/L). Please resolve this discrepancy.
25. **Page 4-22, third full paragraph:** It is possible that there are three sources of VOC contamination: Building 168, Building 449, and the USTs associated with Building 15. The soil gas data (see page 4-30) support Building 15 USTs being a source, while the groundwater data shows a potential source near well 15-MW3. TDS levels are at least an order of magnitude less on the east side of the bulkhead than those on the western side, which may be due to a dropoff in the influx of seawater inland, or may be due to the bulkhead providing some degree of barrier for groundwater flow out to the Seaplane Lagoon.
26. **Page 4-25, Arsenic:** Please give the California criteria continuing concentration (CCC) for arsenic used here. **Copper:** Please provide the 95<sup>th</sup> UCL for background copper

- concentration. Please also provide a numeric value for the CCC for copper.
27. **Page 4-26, Lead:** Please provide the 95<sup>th</sup> UCL for background lead concentration. Please also provide a numeric value for the CCC for lead.
  28. **Page 4-27, Manganese:** Please provide the 95<sup>th</sup> UCL for background lead concentration. **Mercury:** Please provide the 95<sup>th</sup> UCL for background mercury concentration. **Nickel:** Please provide the 95<sup>th</sup> UCL for background nickel concentration. **Zinc:** Please provide the 95<sup>th</sup> UCL for background zinc concentration.
  29. **Page 4-29, Section 4.3.3:** Please provide an explanation of the transport mechanism that would allow soil gas to be migrating from an activity outside the boundaries of IR 27.
  30. **Page 4-30, last paragraph:** It is possible that there are three sources of VOC contamination: Building 168, Building 449, and the USTs associated with Building 15. The soil gas data support Building 15 USTs being a source, while the groundwater data shows a potential source near well 15-MW3. TDS levels are at least an order of magnitude less on the east side of the bulkhead than those on the western side, which may be due to a dropoff in the influx of seawater inland, or may be due to the bulkhead providing some degree of barrier for groundwater flow out to the Seaplane Lagoon.
  31. **Figure 4-1, Parameter Analyzed for Nature and Extent Evaluation - Soil and Soil Gas:** It appears that some SI PAH soil sample locations may be missing from Figure 4-1; Figure 4-1 has seven PAH soil sample locations but Figure 1-12 depicts nine locations. It appears that PAH soil sample locations 32EDC-12-17 and 32EDC-12-6 are missing from Figure 4-1. Please resolve this discrepancy. Also, please review Figure 4-1 to ensure that all samples collected during the various investigations are depicted.
  32. **Figure 4-9, BTEX and MTBE in Monitoring Wells (1995 - 2004) and Table B1-2, UST Removal and Pos-Removal Investigations Data - Water:** There are discrepancies between the analytical results reported in Table B1-2 and those posted on Figure 4-9. For example, the 1995 result for Toluene in 15-MW1 is listed as 0.8 ug/L in Table B1-2, but as 2 ug/L on Figure 4-9. There are also discrepancies in the results posted for 15MW-2 and 15-MW3. The data for other wells was not checked with data summary tables. Please reconcile these discrepancies and verify that the data in Table B1-2 are correct.
  33. **Table 4-2, Organic and Inorganic Reported in Soil:** Table 4-2 indicates that 8 cadmium samples exceed criteria, but it appears that the maximum concentration does not exceed the residential PRG. Please resolve this apparent error.
  34. **Page 5-4, last paragraph:** What would cause a vertical gradient upward from the lower FWBZ to the upper FWBZ? One would expect not to see a gradient in unconfined conditions.

35. **Page 6-8, top of the page:** For which scenario is the indoor-air risk associated with vinyl chloride being evaluated?
36. **Page 7-1, last paragraph, last sentence:** The step out sampling performed during the RI does not support IR 9 being a source of groundwater contamination. Groundwater samples in the southeastern corner of IR 27, closest to the IR 9 boundary show non-detect for most VOCs.
37. **Appendix B Historical Data Tables, Environmental Baseline Survey Data, Table B2-1 EBS Data-Soil, Pages 1 through 20:** Table B2-1 does not state why the PAH data from the EBS were not included in Table B2-1. This reason is stated in Section 4.1.1 Soil Investigations on page 4-1. Without an explanation in Table B2-1, it appears that PAH results were omitted from Table B2-1. Please add a footnote to Table B2-1 to explain why PAHs with their associated analytical results from EBS were not included in Table B2-1.
38. **Appendix D, Boring and Well Logs:** It is not clear why there are two water table elevation symbols in the header for some well logs; one is solid and the other is hollow. Also, it is unclear why there are four elevations in this box on the logs for 27MW01, 27MW02, and 27MW03. For example, the borehole log for 27MW01 has the following values entered in this field: "5.40/5.87 5.87" and "/-11.27". Please provide a Borehole and Well Log Symbol Explanation page that includes the watertable symbols shown in the field titled "Ground Elevation(ft) Depth/Elevation Groundwater (ft)" for the borehole logs checked by "P. Stang, RG". Additionally, please explain the multiple values entered in this field mentioned for the borehole logs 27MW01, 27MW02, and 27MW03.
39. **Section K7.1, Data Evaluation, Page K-18:** There is no discussion provided within the Uncertainty Analysis (Section K7, including subsection K7.1) regarding the potential effect on the risk assessment of using data with elevated detection limits (relative to health-based screening criteria). It is suggested that a discussion be presented which is similar to that provided in Section 3.5.2 (Detection Limits), and expand that discussion to include information about how the risk assessment may have been affected by using data with elevated detection limits. Specifically, please discuss this issue in relation to detections of tetraethyl lead in soil. Table 3-13 indicates that out of a total of twelve samples collected for analysis of tetraethyl lead, eleven were reported present at estimated concentrations less than the detection limit, which exceeded the preliminary remediation goal (PRG). Please revise this section of the RI to describe the potential effects on the quantitative risk assessment of using data with elevated detection limits.

## APPENDIX L, SCREENING-LEVEL ECOLOGICAL RISK ASSESSMENT

## GENERAL COMMENTS

The conclusion that IR Site 27 does not pose a significant risk to terrestrial receptors is reasonable. IR Site 27 is a developed site with pavement, limited ruderal grassland, and barren surface soil. Adjacent areas are also developed or disturbed with the exception of the adjacent Seaplane Lagoon. The future land use is anticipated to be similar in terms of habitat value. The conclusion that discharge of groundwater from IR Site 27 does not pose a significant risk to aquatic receptors in Seaplane Lagoon is also reasonable. No dilution or attenuation factor was used to reduce the exposure point concentrations adding a measure of protectiveness.

## SPECIFIC COMMENTS

- 1. Section L1.1, Site Location and Description, Page L-2:** This section does not contain a brief description of the site history; this information also appears to be absent from the conceptual site model described later in the document. The site history (e.g., industrial operations) is an important to support the conceptual site model. Please revise this section to include a brief paragraph summarizing the site history and a reference to the pertinent section that provides additional information in the main document.
- 2. Section L1.3, Identification of COPECs, Page L-7:** Compounds not reported at concentrations greater than detection limits were eliminated as contaminants of potential ecological concern (COPECs) but the SLERA does not include a data evaluation to ensure that reporting limits were low enough for screening. Please revise this section to confirm that reporting limits were low enough to support the SLERA; if reporting limits are elevated relative to screening values, please describe this in the uncertainty section.
- 3. Section L1.3, Identification of COPECs, Page L-7 and Table L-2, Soil COPECs for IR Site 27, Page L-9:** The table does not contain information on the depths from which maximum concentrations were detected. Samples from 0 to 7 feet below ground surface (ft bgs) were considered in the SLERA for terrestrial exposures. This is a larger depth range than recommended in State guidance. Please provide the depth at which maximum concentrations were detected. Please also include a description of depths of soil contamination in this section or the conceptual site model.
- 4. Section L1.4, Contaminant Fate and Transport, Page L-8:** The seawall located between Seaplane Lagoon and IR Site 27 is not described in either this or previous sections; yet, it is depicted on Figure L-3. Please revise this section to include a description of the seawall as well as the impact of the seawall, if any, on contaminant fate and transport.
- 5. Section L1.6, Conceptual Site Model, Page L-18:** The document does not clearly state (with supporting information) whether or not soil erosion with surface runoff is anticipated to reach Seaplane Lagoon. For example, soil erosion to the lagoon is

considered unlikely in Section L1.4; however, the supporting information such as, "IR Site 27 is essentially all paved" is not easily verified by reviewing Sections L1.1 / L1.2 or Figure L-3. The converse statement, ".....soil COPECs may migrate with soil erosion patterns....." on page L-18, and the unpaved land shown on Figure L-3 do not support the conclusion that soil erosion is unlikely. Please resolve these apparent discrepancies.

6. **Section L2.1, Toxicity Reference Values for Mammals and Birds, Page L-20:** The high-toxicity reference value (high-TRV) is based on an approximate midpoint of the range of effect levels; however, according to 1997 US EPA Guidance, the lowest exposure level shown to produce adverse effects in a potential receptor species is defined as the lowest observed adverse effect level (LOAEL). The text indicates that TRVs used in this SLERA are low-TRVs unless otherwise noted. Since a discrepancy exists regarding defining a LOAEL, please provide the location and rationale for any TRVs used in this SLERA that are not consistent with a no observed adverse effects level (NOAEL).

Also, this section lacks specific information describing the hierarchy of sources from which TRVs were extracted for compounds without a Navy Biological Technical Assistance Group (BTAG) TRV. Please provide this information in the text of this section.

7. **Section L3.5, Exposure Factors, Page L-45:** The text indicates that minimum body weights were used for this SLERA and that ingestion rates were estimated from body weight predictive equations. The footnote marked "c" for Table L-11 indicates that the mean of adult male and female body weights was used, contrary to the previous text. Please provide the rationale for using a mean body weight, potentially resulting in an underestimation of risk, instead of the more conservative minimum body weight.
8. **Section L5, Uncertainty Analysis, Page L-55:** The uncertainty analysis is very general and does not provide an evaluation of uncertainty associated with specific exposure parameters or toxicity values. According to 1997 EPA guidance, "exposure assumptions used should be stated, including some description of the degree of bias possible in each. Where literature values are used, an indication of the range of values that could be considered appropriate should be included. Please revise the uncertainty section to contain additional detail regarding exposure parameters (particularly mean body weight assumptions) and toxicity values (particularly values obtained from other sources than the BTAG and values other than NOAELs).

## MINOR EDITS

1. There are discrepancies between the text of Section 1 of the RI Report and the Historical Data Tables found in Appendix B. These discrepancies include but are not limited to:
  - a) On page 1-11 in the third paragraph, the text states groundwater and soil "Samples were analyzed for VOCs and only methylene chloride was reported above the

detection limit.” However, in Tables B4-1 and B4-2 in Appendix B several volatile organic compounds (VOCs) are reported above the detection limits for both soil and groundwater.

- b) On page 1-14 in the fourth paragraph (Target Area 2) the text states “One VOC compound, cis-1,2-DCE, was reported at a low concentration (8 micrograms per kilogram [ug/kg]),”but, in Table B2-1 in Appendix B cis-1,2-dichloroethene (cis-1,2-DCE) was detected at a concentration of 6.3 ug/kg and 1,2-dichloroethene was detected at a concentration of 8 J ug/kg.

Please reconcile the text with the Historic Data Tables and revise the text to more accurately reflect the historical data.

2. **1.3.4.3, EBS Parcel 140, Page 1-18:** The second paragraph states that soil sample location 140-SN-003 is on the incorrect side of Building 168, but Figure 1-9 shows this sample location on the east side of Building 168 not the west, as stated in the text. Please resolve this discrepancy.
3. **Figure 2-5, Geologic Cross Section Locations (C-C' and D-D').** There is a discrepancy between some of the distances shown on this figure and the distances on Figures 2-6 and 2-7. The distance from the west end of Cross-section C to soil boring 27B09 is depicted to be 10 feet on Figure 2-5, while the distance between corresponding points on Figure 2-6 is 100 feet. At the other end of the cross section 10 feet corresponds to 1900 feet. Similar problems exist with figure 2-7. Please revise the cross-sections to accurately represent horizontal distances.
4. **Section 3.3.1.1, Site Investigation Sampling And Analysis, Pages 3-15 and 3-16:** There is a discrepancy in the number of direct push borings advanced during the Site Investigation (SI) for Transfer Parcel EDC-12. This section states that there were eight borings, but the text on page 1-28 (Section 1.3.5.1) states there were nine borings and Figure 1-12 shows nine boring locations. It appears that boring 32EDC-12-17 is missing from Section 3.3.1.1. Please resolve this discrepancy.
5. **Section 4.1.1.1, Previous Petroleum Hydrocarbon Investigations, Page 4-2:** The first paragraph cites station 138-Z18-001, but this location does not appear on any of the figures. It appears from Table 2B-1 in Appendix B that the station name should be 138-Z17-008. Please resolve this discrepancy.
6. **Section 4.1.1.2, Data Gap Investigation Sampling and Analysis, Page 4-4:** This section states that the 12 station identification numbers are listed in Section 1.3.4.6, but there are 13 soil sample locations listed in Section 1.3.4.6. Please resolve this discrepancy.
7. **Section 4.1.3.1, Volatile Organic Compounds, Halogenated VOCs, Page 4-8:** The text of the second bullet cites “RI boring 27B3,” appears that this reference should be to 27B53 Please resolve this discrepancy.