



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

N00236.002427
ALAMEDA POINT
SSIC NO. 5090.3

October 26, 2001

Mr. Michael Bloom, Code 06CA.MB/0839
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

RE: Draft Technical Memorandum, Oakland Inner Harbor (IR Site 20) and Todd Shipyard (IR Site 28), Alameda Point

Dear Mr. Bloom:

EPA's ecologist Dr. Ned Black has reviewed the above referenced document and finds it to be generally acceptable. He has also consulted with Dr. James Polisini of DTSC and supports Dr. Polisini's concerns with the document. In addition to addressing the concerns of Dr Polisini, Dr. Black would like to emphasize the following:

1. While the presentation of the data and associated conclusions in this report are acceptable, EPA would like to know explicitly what the Navy proposes to do regarding these sediments and the relevant stormwater pathways. The Navy should perform an investigation and interim cleanup of the stormwater system itself to halt any further contamination of the sediments at IR Sites 20 and 28. It is clear from this report that the stormwater system is or was a source of contamination to the Inner Harbor, and any on-going contamination must be halted as soon as possible. If this step has already been taken, a description of which stormwater drains were investigated and cleaned, and what levels of contamination were found during the clean up, should be included in the document.
2. EPA also noted the discrepancy between the width of the shallow sediment shelf described in this report as compared to reports prepared by the Navy several years ago on sediments associated with stormwater outfalls from the Alameda Annex. The Navy should confirm the dimensions of the shallow sediment shelf.

Thank you for providing us with an opportunity to review this document. If you have any questions, please call me at (415) 744-2367, or Dr Black at (415) 744-2354.

Sincerely,

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

Anna-Marie Cook
Remedial Project Manager

cc: Ned Black, EPA
Michael McClelland, SWDiv
Andrew Dick, SWDiv
Daniel Murphy, DTSC
Dennis Mishek, RWQCB
Elizabeth Johnson, City of Alameda
Michael John Torrey, Co-Chair Alameda RAB