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ALAMEDA POINT
SSIC NO. 5090.3



Arnold Schwarzenegger
Governor

August 26, 2005

Mr. Thomas L. Macchiarella
Southwest Division Naval Facilities Engineering Command
Attn: Code 06CA.TM
1220 Pacific Highway
San Diego, CA 92132-5190

DRAFT FINAL REMEDIAL INVESTIGATION REPORT, IR SITE 27, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the Response to Comments on the Draft Remedial Investigation (RI) Report for IR Site 27 and the relevant changes to the document. We find the responses to be acceptable with the following remaining concerns:

- 1. Vertical Extent of VOCs in groundwater:** DTSC questions the interpretation of the vertical extent of VOCs in groundwater and requests that the Navy verify the vertical extent during the Remedial Design/Remedial Action phase of the IR Site 27 project. The area of particular concern is in the vicinity of monitoring well 27MW06 and discrete groundwater sampling location 27B22.
- 2. Response to HERD Comment number 2:** DTSC appreciates the Navy response that the inorganic element 'background' data sets designated pink, blue and yellow, based on fill episodes, will be forwarded to HERD in an Excel-compatible format. These files can be forwarded to Human and Ecological Risk Division (HERD) electronically at jpolisin@dtsc.ca.gov or a Navy FTP site, with user code and password, can be forwarded for HERD download access.
- 3. Response to HERD Comment number 5:** The Reporting Limit (RL) for the dioxin/furan analysis (TCDD) is included as footnote in Table 4-2 as requested. The RL for TCDD is the range of 1 µg/kg to 5 µg/kg while the U.S. EPA Region 9 Preliminary Remediation Goal (PRG) for dioxins, based on the most toxic dioxin tetrachlorodibenzo-p-dioxin (TCDD), in soil is 3.9×10^{-6} mg/kg or 3.9×10^{-3} µg/kg

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(0.0039 µg/kg). Soil samples at IR Site 27 indicated as 'not reported' could still pose some unknown cancer risk at the TCDD RL of these samples. This comment is meant for the project record and no response is required from the Navy or Navy contractors.

4. **Response to HERD Comment number 23:** HERD commented that minimum Body Weight (BW) should not be used in the Screening Level Ecological Risk Assessment (SLERA), but a mean BW or upper confidence limit on the mean. The response cites U.S. EPA (1997) guidance for using the minimum BW in a SLERA, but then pairs the minimum BW with intake estimated from body weight based on regression equations (e.g., Nagy, 2001). This is incorrect for a SLERA. The complete direction by U.S. EPA (1997, Section 2.2.1) for a SLERA is to use minimum BW paired with maximum intake rates (<http://www.epa.gov/oswer/riskassessment/ecorisk/ecorisk.htm>). Use of best-fit regression estimates of intake based on minimum BW clearly does not generate maximum intake rates and the method used is in error. Please correct the estimate of intake for vertebrate receptors and the estimate of ecological hazard for these receptors. The HERD believes that the SLERA calculation of intake and, therefore, hazard for ecological receptors is incorrectly performed. The assessment of ecological hazard for terrestrial receptors in the SLERA should be corrected.

DTSC appreciates the opportunity to comment on the RTC to IR Site 27 draft RI. If you have any questions regarding our comments, please do not hesitate to contact me at 510-540-3767 or mliao@dtsc.ca.gov.

Sincerely,



Marcia Liao
Remedial Project Manager
Office of Military Facilities

cc: Greg Lorton, SWDiv
Anna-Marie Cook, EPA
Judy Huang, RWQCB
Elizabeth Johnson, City of Alameda
Peter Russell, Russell Resources
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