

August 30, 2004

Lea Loizos
ARC Ecology
833 Market Street, Suite 1104
San Francisco, CA 94103

RE:EDC-5 Site Inspection Report

Dear Ms. Loizos,

At the July RAB meeting, we provided comments on the EDC-5 site inspection report. This letter restates those comments so that you can include them in your response to the report.

The Alameda Point Collaborative(APC) is a supportive housing program, working with 500 families and individuals to provide the support, training and opportunities they need live stable productive lives.

Our mission is to build "one community enriching lives through the sharing of resources and talents". Our most important resources are the people of our community, and the land we are located on. Our 34 acres, 20 acres of which is open space, has the potential to be the economic engine that supports our organization and our residents, a source of nutritious food products that will promote health and provide income, and a safe, protected environment where our children can play and grow.

Any plan that calls for remediation by putting in place use or access restrictions does not solve the problem, it only identifies the problem and then places the burden on the end user of the land to deal with it - in this case residents. That is not the intent of environmental remediation. Furthermore, any restrictions that are put in place are totally unenforceable. We will not accept a remediation plan that does not fully mitigate the site to the point where we can use the land as the resource it is.

It is from that principle that we have reviewed the EDC-5 report and have identified the following concerns:

1. Additional Sampling

Additional sampling needs to take place to ensure that all risks have been identified. EBS Parcel 78(APC headquarters and Head Start Childcare Center) was not sampled at all. Testing should include this sensitive area. In addition, significant areas of Decision Area 8 , 13 and 14 were left off of the sampling grid(Fig.1) These areas should be tested for PAH levels, particularly given the elevated PAH levels found in neighboring sites.

2. Threshold Level for Remediation

The threshold level for further remediation for PAH has been set too high. Residents living on this property are more susceptible to toxic poisoning due to socioeconomic factors and chronic health factors, a fact that has been established at other similar sites in studies done by the EPA. It is therefore not acceptable to set the threshold for PAH remediation at 1,000 $\mu\text{g}/\text{kg}$. It should be set at 620 $\mu\text{g}/\text{kg}$ if not lower.

A remediation depth of only 2 feet is also not adequate to restrict future land use. The remediation depth should be at least 4 feet if not deeper. Lastly, all 55 sites with a total risk level equal or greater than the target risk level should be considered for further remediation, rather than just the 26 sites selected. Basing the risk assessment on only the incremental risk is not realistic as it assumes there is no cumulative effect from background concentrations.

Previous Time Critical Remediation Actions fell short of adequate mitigation. Baseline testing for the previous PAH remediation failed to cover enough areas, thus critical sites were left out of the remediation. As can be seen from the attached map (Fig. 2), sampling areas were limited in size. Follow-up testing has shown that neighboring areas are still at risk (Fig. 3). Remediation must include all contaminated areas, and must take place to a depth that is adequate to prevent restrictions on use of the land.

Thank you for serving as the technical coordinator on this project, and for incorporating and forwarding our comments to the appropriate agencies.

Please don't hesitate to contact Doug Biggs, our Community Resources Director, at (510)898-7849, should you have any questions or require any further details.

Sincerely,



John N. Shepherd
Executive Director

cc: Anna-Marie Cook, EPA
Judy Huang, RWQCB
Thomas Machiarella
Jerry Orlando, TOSCC

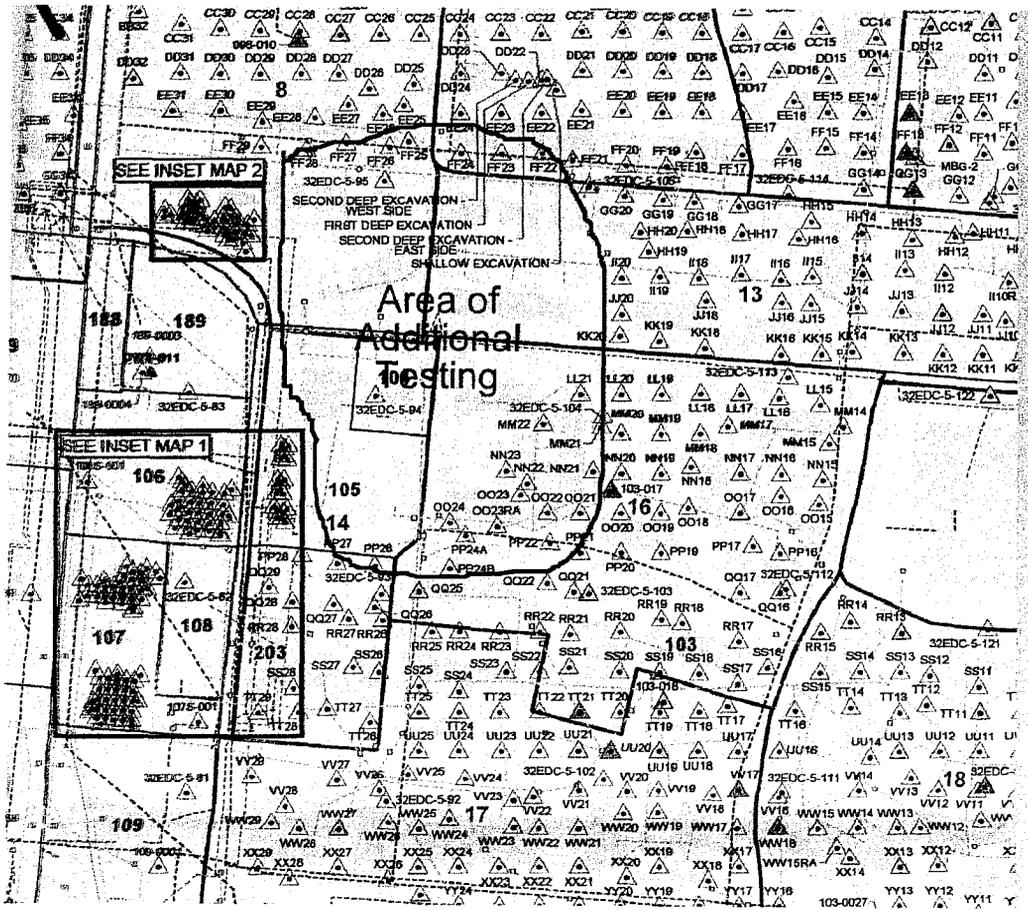


Figure 1: Area requiring additional testing

