



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

N00236.002589  
ALAMEDA POINT  
SSIC NO. 5090.3

June 29, 2004

Thomas Machiarella  
Department of the Navy  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, CA 92132-5190

Re: Draft Final Remedial Investigation Report, Seaplane Lagoon, Former NAS Alameda,  
dated May 27, 2004

Dear Mr. Macchiarella,

EPA has reviewed the Draft Final Remedial Investigation Report for the Seaplane Lagoon at former NAS Alameda. We agree with the Navy's assessment of the nature and extent of contamination, including the presence of various contaminants of concern, principally cadmium and polychlorinated biphenyls (PCBs), that pose an unacceptable risk to ecological receptors. We further agree that the primary sources of contaminants to the lagoon are the old outfalls located in the NW and NE corners of the lagoon, and that the highest levels of contamination are found near those corners and along the eastern wall of the lagoon.

We concur with the proposed cleanup goal of 24.5 ppm for cadmium in the sediment, and agree that the resulting cleanup footprint for cadmium will address potential problems for lead, chromium, mercury, DDX, zinc, and dichlorodiphenyltrichloroethane and its degradation products.

The report makes no mention of the unfinished storm drain remediation and closure. The storm drains leading to the Seaplane Lagoon still include potentially high levels of several contaminants, including radium. We would like to reiterate statements by navy personnel that the storm drains are a potential ongoing source of contaminants to the lagoon and that their remediation and closure must occur before remedial work is performed within the Seaplane Lagoon.

However, several issues that we identified in our comments on the draft RI have not been resolved. We do not accept the inclusion of the *Use of an Amphipod Correction Factor for Weight of Evidence Analysis of SPL* (Appendix E.10) or the supplemental amphipod toxicity study described in Sections 5.2.3.1 and 7.1.1. We also do not accept the Weight of Evidence approach as presented in Appendix E.9.

Additionally, EPA does not accept the use of the Uranium Mill Tailings Radiation Control Act (page 233) as a basis for establishing background levels or cleanup goals in sediment sites. All

discussions and analyses of radium cleanup goals must focus on acceptable exposure and risk. We agree that the radium is not a risk driver at this site, but we don't want to see the Navy proposing inappropriate justifications.

We also are not convinced by the Navy's argument in favor of using zero in place of the standard practice of utilizing one-half the detection limits for PCB concentration data. We realize that the older data with high detection limits pose difficulties, but rather than granting approval for using zero for non-detects, we would prefer to focus on the newer, better quality data which provides a fairly good distribution across the lagoon, and evaluate the older data qualitatively in the remedial design phase.

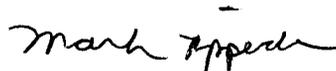
In the human health risk assessment several chemicals have average concentrations greater than the 95% UCL and we have been unable to verify exposure point concentrations from the data provided in the appendices. The exposure point concentrations for risk assessment must be transparent. The Navy did an excellent job in the risk assessment for IR Site 28; please refer to this as a model for future human health risk assessments. At this point in the project the bigger issue will be the calculation of the final PCB 95% UCL.

In the interest of moving forward to the Feasibility Study and a final remediation plan, we are willing to have our nonconurrence on the above sections of the RI report noted for the record and let the RI report go final in its present state.

Finally, PCBs are responsible for human health fish advisories around the San Francisco Bay and EPA believes that sediment sources of PCBs to the greater San Francisco Bay must be remediated. This RI report identifies PCB sediment concentration levels in the Seaplane Lagoon up to 8100 ppb. Thus, as discussed at our last Seaplane Lagoon technical meeting, we expect the Feasibility Study to identify an exposure point concentration remediation goal for PCBs in sediment of 200 ppb for the Seaplane Lagoon. We can discuss an upper bound not-to-exceed value for PCBs in future technical meetings.

Please call me at (415) 972-3028 if you would like to discuss any issues concerning the Seaplane Lagoon.

Sincerely,



Mark Ripperda  
Remedial Project Manager

cc: Judy Huang, CRWQCB  
Marcia Liao, DTSC  
Beckye Stanton, USFWS  
Charlie Huang, Cal EPA/DFG  
Laurie Sullivan, NOAA  
Peter Russel, Northgate Environmental