



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
SFD 8-3

June 27, 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 Final Feasibility Study Report Installation Restoration Site 28, Alameda Point

Dear Mr. Macchiarella:

We have reviewed the Draft Final Feasibility Study for Site 28, Alameda Point and, although there are still some outstanding issues, we are willing to resolve them at the remedy-selection stage.

EPA has concerns regarding whether GW Alt. 2 meets either of the threshold criteria as to the shoreline groundwater, but we are willing for the FS to go final given that other remedies are presented in the FS, and given that the Navy has acknowledged in the FS and/or response to comments that more analysis is necessary as to the use of a dilution factor in analyzing impacts on the surface water, that risk management decision makers have not yet concluded whether remedial action is warranted to protect offshore receptors, and that GW Alt.2 is essentially a no-action remedy as to offshore receptors. EPA would not be able to concur in selection of this remedy unless the Navy could demonstrate that use of dilution is appropriate in this situation under the Basin Plan and California SIP, and that the remedy would be protective of offshore receptors, and in addition included in the ROD a re-opener to address any relevant information developed in the Site 20 RI/FS process.

We remain concerned with the categorization of the groundwater at this site and find the argument that "groundwater samples from the majority of the monitoring wells (three out of four) would classify the groundwater underlying IR Site 28 as Class III based on TDS" misleading in light of the acknowledgment in the report and in the response to comments that the inland groundwater has been inadequately characterized and bounded by having only one monitoring well, and given the general approach in the report of analyzing the inland and shoreline groundwater separately.

Additionally, we are concerned that ICs to protect construction workers will need to be more specifically developed, and that the Navy has not adequately responded to comments regarding mercury in the shoreline water.

We recommend that the Navy take additional samples of the shoreline groundwater prior to choosing a remedy, and to work closely with the Regional Board to determine whether it is appropriate to consider dilution of groundwater contaminants when they enter the surface water.

We look forward to the resolution of the outstanding issues at the remedy-selection stage and to continued progress with the clean up of Site 28. Please call me at (415) 972-3029 if you have any questions.

Sincerely,



Anna-Marie Cook
Remedial Project Manager

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