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

August 22, 2007

Mr. Thomas Macchiarella, Code 06CA. TM
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Re: Review of the Draft Final Remedial Investigation Report, IR Site 20 (Oakland Inner Harbor) and IR Site 24 (Pier Area), Alameda Point, Alameda, California, July 2007

Dear Mr. Macchiarella:

The U.S. Environmental Protection Agency (EPA) Region 9 has received the Draft Final Remedial Investigation Report, IR Site 20 (Oakland Inner Harbor) and IR Site 24 (Pier Area), Alameda Point, Alameda, California, dated July 27, 2007. We have reviewed the aforementioned document and the Navy's responses to our April 27, 2007 review comments on the Draft Revision 1 version. Our comments are enclosed.

If there are any questions, please feel free to contact me at (415) 972-3002.

Sincerely,

Xuan-Mai Tran
Remedial Project Manager
Federal Facilities and Site Cleanup Branch

Enclosure

cc: Dot Lofstrom, DTSC Sacramento
Erich Simon, SFRWQCB
John West, SFRWQCB
Peter Russell, Russell Resources, Inc.
Suzette Leith, EPA
John Chesnutt, EPA
Mary Parker, BRAC PMO West

Review of the Draft Final Remedial Investigation Report
IR Site 20(Oakland Inner Harbor) and IR Site 24 (Pier Area)
Alameda Point, Alameda, California
July 2007

Response to Comment # 6 (Originally in response to Specific Comment # 23): The response does not fully address the concern expressed in the original comment. The concern is that the conceptual model lacks specificity when describing potential sources of chemical contamination. Previous Alameda Point documents (e.g., for IR 20, the OU-2C and IR Site 28, Todd Shipyards RI Reports; and for IR-24, the OU-2B RI, and the EDC-12 and EDC-17 Site Inspection Reports) have provided historical information indicating that specific activities (e.g. sand blasting and metal plating) have occurred adjacent to and upgradient/upstream of both IR Sites 20 and 24, which may have resulted in elevated metal concentrations in sediment. Direct runoff from these adjacent sites and storm sewer drainage may have impacted the sediment of Sites 20 and 24. Please include sandblasting and metal plating activities as potential sources of contamination to sediments.

Response to Comment # 8 (Originally in response to Specific Comment # 30): The response does not provide support for the statement in the report that concentrations of dieldrin and 4,4-DDX have decreased and the assumption that this is due to degradation. It is unlikely that dieldrin and 4,4-DDX would degrade in sediment; these chemicals do not degrade easily in any natural conditions and significant documentation of these transformations in sediment is without precedent. As stated in EPA's original comment, the more likely explanation for the difference in concentrations is the fact that sampling locations in different years were not co-located. In the future, please do not imply or conclude that pesticides like dieldrin and 4,4-DDX have degraded unless there is substantiation that this process is actually occurring.