



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

May 1, 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: Draft Report for Data Gap Sampling Installation Restoration Site 26,  
Alameda Point**

Dear Mr. Macchiarella:

Please find enclosed EPA's comments on the above referenced document. The comments were sent to the Navy via e-mail on February 15, 2007 and, as per your request, this hard copy is for your records.

We appreciate the opportunity to review the report and look forward to beginning remedial action at Site 26 by the end of October 2007.

Sincerely,

A handwritten signature in cursive script that reads "Anna-Marie Cook".

Anna-Marie Cook  
Remedial Project Manager

enclosure

cc list: Steven Peck, Navy  
Dot Lofstrom, DTSC  
Erich Simon, RB  
Karla Brasaemle, TechLaw Inc

**EPA Review of Draft Report for Data Gap Sampling  
Installation Restoration Site 26,  
Alameda Point, Alameda**

**SPECIFIC COMMENTS**

1. **Section 4.4, Contaminant Distribution in Groundwater, Page 15 and Figure 4, Sample Locations and Groundwater Analytical Results:** Although the text states that groundwater analytical results “were consistent with previous interpretations of the lateral limits of the groundwater VOC plume as depicted in the relevant RI/FS documents for the site” and the contours on Figure 4 are the same as those used in the Remedial Investigation (RI) Report, the extent of contamination above the maximum contaminant level (MCL) is actually greater than the extent of contamination indicated in the RI. Specifically, the extent of contamination above the MCL (5 micrograms per liter [ug/L] for trichlorethene [TCE]) or the 5 ug/L total VOC contour line should be extended to the south to include new well 26MW04, where the TCE concentration was 10 ug/L. In addition, the total VOCs in hydropunch boring B20-SB-004 (2.6 ug/L) indicate that the 0.5 ug/L total VOC contour should be extended to the north to include this location. The second sentence of this section acknowledges that the extent of contamination is greater, but then the second part of the sentence contains a contradiction because it states that the data collected during the Data Gap Investigation “were consistent with the VOC plume boundaries delineated during previous investigations.” It appears that the axis of the plume may be oriented northeast/southwest rather than east-northeast to west-southwest as shown on Figure 4. Since the RI contours potentially conflict with the new data, Figure 4 should be updated to reflect the most recent data. In addition, the new data suggests that the extent of contamination may not have been determined south of well 26MW04. Please update the contour lines to reflect current VOC data and delete the quoted statements from the first and second sentences of Section 4.4 or revise them to clearly describe the extent of contamination. Please also clarify how the area for in-situ chemical oxidation and bioremediation will be determined since the extent of contamination does not appear to have been determined south of well 26MW04.
2. **Figure 4, Sample Locations and Groundwater Analytical Results:** It is unclear why the 10 ug/L concentration of TCE for Monitoring Well 26MW04 on this figure is not bolded, since it is above the Remedial Action Objective (RAO) of 5 ug/L. Please provide consistency with respect to bolded concentrations on this figure.
3. **Table 4, Analytical Results for Groundwater Monitoring Wells: Dissolved Metals and Table 3, Analytical Results for Groundwater Monitoring Wells: Chlorinated VOCs:** It is unclear why a duplicate sample is indicated in Table 4 for well 26MW07, when there are no primary sample results. It appears that the designation for a duplicate

sample is appending a "D\*" to the end of the "Sample ID," but the footnotes to Tables 3 and 4 indicate that a duplicate sample is designated only with an asterisk (\*). Please provide the missing primary metals data for well 26MW07 and reconcile the footnotes for these tables with the designation used in the Sample ID.

In addition, it appears that on Table 4, the concentration of barium in IR26MW07, 1400 ug/L should also be in bold face type since this value exceeds the screening criteria of 1000 ug/L. Please make this change.

4. **Appendix A, Sampling and Purge Forms:** Although the purge and sample form for Well 26MW03 indicates negative turbidity values, it should be noted that turbidity can not be less than zero. Negative turbidity values may indicate that the meter is out of calibration. Please provide an explanation for the negative turbidity values.

Also, on the sampling forms, it is unclear why the multiplier for casing diameter is crossed out, since 0.64 gallons per linear foot is the approximate volume of a 4 inch diameter casing. As a result, the well volume appears to have been calculated incorrectly. Please resolve this apparent discrepancy.