



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

AR_N00236_003057
ALAMEDA POINT
SSIC NO. 5090.3.A

5090
Ser 06CA.RW10289
March 19, 2001

Ms. Anna-Marie Cook
U.S. EPA
Region IX.
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Ms. Cook:

Subj: DRAFT REMEDIAL INVESTIGATION REPORT, OPERABLE UNIT 4A (IR SITE 2),
ALAMEDA POINT, ALAMEDA, CALIFORNIA

The U. S. Navy (Navy) has received comments on the above-referenced document from the U. S. Environmental Protection Agency (EPA). Navy has also received comments from the California Department of Toxic Substances Control (DTSC), the California Regional Water Quality Control Board (Regional Board), and the Golden Gate Audubon Society (Audubon Society). Navy is awaiting comments from U. S. Fish and Wildlife, California Fish and Game, National Oceanic and Atmospheric Administration, and the California Integrated Waste Management Board. Comments received and informal discussions with agency representatives indicate that the document requires substantial modification before it will be accepted. Navy plans to revise and reissue the document as a Revised Draft Remedial Investigation (RI) Report.

Attached for your consideration, and subsequent discussion, is a proposed outline for the Revised Draft RI Report. The proposed outline follows the format presented in *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA* (EPA 1988). The outline presents one potential approach to the presentation of the site characterization data, the baseline human health and ecological risk assessments, and conclusions arising from the data interpretation and risk analyses.

Prior to submittal of the Draft RI Report, Navy had presented the idea of issuing RI Report Addenda to document the radiological survey/removal, geotechnical characterization, and UXO survey/removal to be completed at Site 2. Informal discussions between Mr. Phillip Ramsey, the former EPA RPM for Site 2, and myself led to the conclusion that documentation of the site characterization activities would most appropriately be compiled in a single document. Navy now formally proposes that all site characterization activities be included in a single RI Report.

Recurrent issues throughout the comments received have been the lack of appropriate data to support the conclusions presented and high detection limits, often greater than the relevant risk screening values presented in the document. Based upon the comments and considering the time that has elapsed since site characterization activities were performed, it would appear that additional Site 2 data gathering is necessary. The additional data gathering, the planned radiological survey/removal, and the planned UXO survey/removal for Site 2 will impact the ecological habitat at the site.

Ser 06CA.RW\0289
March 19, 2001

The likely habitat impact(s) may be unacceptable to the public at large and to the Audubon Society in particular. Navy intends to work closely with the BCT and the community to determine a solution to this conundrum that will be satisfactory, if not acceptable, to all concerned.

Navy understands that forward progress with the CERCLA process for Site 2 depends on establishing and maintaining a team-based approach to resolution of the issues brought to light by the Draft IR Site 2 Remedial Investigation Report. As mentioned above, the attached outline has been prepared to begin the discussions inherent to the resolution desired by all. Navy would like to begin those discussions at the earliest time convenient for the other BCT members. Perhaps the discussions can begin at the March 20, 2001, BCT meeting. If other BCT members feel that more time is needed before the discussions begin, we may be able to set a date for the discussions at the BCT meeting. Navy will be prepared for either alternative.

Please feel free to contact me at (619) 532-0952, if you have any questions.

Sincerely,



RICHARD C. WEISSENBORN, P.E.
Remedial Project Manager
By direction of the Commander

Encl: (1) Proposed Outline IR Site 2 Revised Draft RI Report

Copy to:

Ms. Mary Rose Cassa
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2721

Mr. Brad Job
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

ENCLOSURE – PROPOSED OUTLINE IR SITE 2
REVISED DRAFT REMEDIAL INVESTIGATION REPORT

THIS ENCLOSURE IS NOT AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY NAVFAC
SOUTHWEST RECORDS OFFICE TO LOCATE THE MISSING
ENCLOSURE. THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED SHOULD THE
MISSING ITEM BE LOCATED.

FOR ADDITIONAL INFORMATION, CONTACT:

DIANE C. SILVA, RECORDS MANAGER
NAVAL FACILITIES ENGINEERING COMMAND, SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132

TELEPHONE: (619) 532-3676
E-MAIL: diane.silva@navy.mil