



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

August 16, 2004

Mr. 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 Remedial Investigation Report IR Site 28, Todd Shipyards,
Alameda Point**

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document, prepared by Bechtel Environmental, Inc and submitted by the Navy to the agencies on July 15, 2004. We have also reviewed the accompanying Response to Comments (RTC) in which concerns and comments from EPA, DTSC and RWQCB on the Draft Remedial Investigation (RI) Report were resolved. In general, EPA's concerns with the draft document have been satisfactorily addressed by the Navy in the Draft Final version and we therefore concur with the IR Site 28 Remedial Investigation Report.

While no revisions to the RI document are necessary, the following issues were not entirely adequately resolved in the RTC. This letter will serve to record our remaining concerns which may be addressed in the Feasibility Study or Remedial Design phases of the process for Site 28. Firstly, the issue of potential migration of contaminated groundwater through unconfirmed storm sewer or pipe bedding material remains a concern and must be resolved. Secondly, with regard to the MTBE contamination found in groundwater at Site 28, please be aware that contamination beneath Navy property remains the Navy's responsibility to clean up, regardless of whether it originates from neighboring Alameda Gateway, Inc.

Thank you for submittal of the Draft Final Site 28 Remedial Investigation Report. We look forward to continued progress on this site. If you have any questions, please call me at (415) 972-3029.

Sincerely,

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

Anna-Marie Cook
Remedial Project Manager

cc list: Jennifer Stewart, SWDiv
Judy Huang, RWQCB
Marcia Liao, DTSC
Elizabeth Johnson, City of Alameda
Lea Loizos, Arc Ecology
Jean Sweeney, RAB Co-Chair
Sophia Serda, EPA
Karla Brasaemle, TechLaw Inc