



Department of Toxic Substances Control



Terry Tamminen
Agency Secretary
Cal/EPA

700 Heinz Avenue, Suite 200
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Arnold Schwarzenegger
Governor

January 25, 2006

Mr. Jerry Dunaway
Department of the Navy
BRAC Program Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310

**Mare Island Navy Draft Final Site Inspection of the Horse Stable Area, dated
December, 2005**

Dear Mr. Dunaway:

The Department of Toxic Substances Control has reviewed the subject document. The attached comments are forwarded to you for your consideration.

Should you have any questions regarding this letter, please call me at (510) 540-3773.

Sincerely,

Chip Gribble
Remedial Project Manager
Base Closure Unit
Office of Military Facilities

Attachment

cc: See next page

Mr. Jerry Dunaway
January 25, 2006
Page 2

cc: Mr. George Leyva
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612

Ms. Carolyn d'Almeida
U. S. Environmental Protection Agency
413 Poppyfield Drive
American Canyon, California 94503

Mr. Dennis Kelly
Tetra Tech EM Inc.
135 Main Street, Suite 1800
San Francisco, CA 94105

**DTSC Comments on the Mare Island Navy Draft Final
Site Inspection of the Horse Stable Area, dated December, 2005**

1. Appendix D, Navy response to DTSC comment number 2: Please add to this section of the report text a statement that the regulatory agencies do not agree at this time with a conclusion that the WMA is suitable for unrestricted use with respect to MEC, and that the WMA is currently scheduled for additional investigation to resolve this issue.
2. Appendix D, Navy response to DTSC comment number 3: It is not appropriate to determine if groundwater has concentrations that require further investigation based on a potability determination. The SI level of investigation should be focused on ascertaining whether a release has or hasn't occurred. A RI level of investigation should be focused on defining the nature and extent of contamination and the corresponding risks. And a RAP/ROD may consider various levels of cleanup based on likely reuse scenarios such as open space, or industrial reuse, or non-residential reuse, with appropriate use restrictions, such as a prohibition against potable use of groundwater, in combination with restricted use scenarios.
3. Appendix D, Navy response to DTSC comment number 4: It is not appropriate to determine if soil or groundwater contain concentrations that require further investigation based on the screening criteria defined in section 3.0, in particular industrial PRGs. The SI level of investigation should be focused on ascertaining whether a release has or hasn't occurred. A RI level of investigation should be focused on defining the nature and extent of contamination and the corresponding risks. And a RAP/ROD may consider various levels of cleanup based on likely reuse scenarios such as open space, or industrial reuse, or non-residential reuse, with appropriate use restrictions in combination with restricted use scenarios. From the sampling results, it is clear there has been a release in this vicinity and that elevated levels of contaminants remain following the removal of the sandblast grit, and that additional investigation is warranted. However, the Comparison Criteria section 3.0 as well as the section 2.2 Potential Exposure Pathways should be revised and significantly simplified accordingly.
4. Page 7, section 1.1.3.1, last sentence: S/A comment number 1.
5. Page 14, section 2.2: S/A comment number 3.
6. Page 16, section 3.0: S/A comment number 3.
7. Page 29, section 5.1.1, para. 2: Arsenic and other metals data should be evaluated 1) in comparison to the 95th ambient/background level and mean, as well as 2) for spatial distribution of concentrations to assess non-random distribution. Please revise to include both evaluations.

8. Figure 4: Please revise this figure to also show all arsenic quantitative results, not just those exceeding the 95th ambient/background level.
9. Figure 5: Please revise this figure to also show all chromium quantitative results, not just those exceeding the 95th ambient/background level.
10. Page 23, section 6.1 and 6.2: We agree with the general conclusion that there has been a release in this vicinity and that elevated levels of contaminants remain following the removal of the ABM, and that additional removal/investigation is warranted. We do not agree with the specific conclusions and recommendations as written because the analysis was based in particular on incorrectly applied screening criteria.