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MARE ISLAND
SSIC NO. 5090.3.A



Terry Tamminen
Agency Secretary
Cal/EPA

Department of Toxic Substances Control

700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721



Arnold Schwarzenegger
Governor

January 20, 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 Preliminary Assessment/Site Inspection of the Paint Waste Area, Investigation Area I, Reuse Parcel XVI, 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

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

**DTSC Comments on the Mare Island Navy Draft Final
Preliminary Assessment/Site Inspection of the Paint Waste Area,
Investigation Area I, Reuse Parcel XVI, dated December, 2005**

1. For the PA portion of this report, please include a discussion of the preliminary findings through a site history investigation including a review of historical documents such as historical maps, photos, shipyard records, etc.
2. Appendix E, Navy response to DTSC comment number 3: It is not appropriate to determine if soil or groundwater contain concentrations that require further investigation based on the screening criteria defined in section 4.0, in particular industrial PRGs, and TPH screening criteria (Tetra Tech 2003b) that are not approved. The PA/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 paint waste debris, and that additional investigation is warranted. However, the Comparison Criteria section 4.0 should be revised and significantly simplified accordingly.
3. Page 14, section 4.0: S/A comment number 2.
4. 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 paint waste debris, and that additional 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.