

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



August 30, 2007

Mr. Michael Bloom
Dept of the Navy
Base Realignment and Closure
Program Management Office
1455 Frazee Road, Suite 900
San Diego, CA 92108-4301

RE: Draft Final Remedial Action Plan/Record of Decision for Installation Restoration Site 17,
Mare Island, Vallejo, California, May 1, 2007

Dear Mr Bloom:

EPA has reviewed the Draft RAP/ROD for IR 17 and offers the following comments.

General Comments:

1. EPA submitted numerous comments on the Human Health Risk Assessment in the 2001 Draft Remedial Investigation for this site that have not been addressed. Navy asserted that they lacked the tools to adequately assess potential risk from the vapor intrusion pathway, but still wished to proceed with a cleanup action for this site, and reevaluate the risks to human health based on the conditions that remained. While the agencies accepted the Navy's proposal to proceed with cleanup, the baseline human health risk assessment was never accepted or approved by the agency toxicologists. The agencies therefore consider this to be an interim action designed to address Applicable or Relevant and Appropriate Requirements (ARARs) only. All statements regarding risk determinations should be deleted from this RAP/ROD.
2. The RAP/ROD states that the property is anticipated for industrial use, however current property transfer discussions indicate that the property is now anticipated for use as university campus and housing. The reuse assumptions in the RAP/ROD do not reflect the current reuse proposals.

Specific Comments:

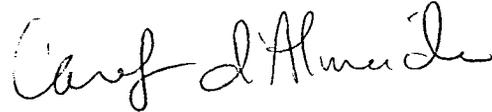
1. Page 1-2, section 1.5. Statutory Determinations. The statement in the first paragraph that this action constitutes a permanent solution is misleading; without an approved risk assessment, we can make not statements that it is a final solution. Also, the statement that the remedy satisfies the statutory preference for treatment as a principle element should be deleted as the proposed action does not employ treatment technology. Further, all references to reduction of toxicity, volume or mobility should be deleted as well as

these statements are only applicable for remedies that utilize treatment technologies. The nine criteria evaluation discussion should simply read "not applicable" for this criterion.

2. Page 2-45 Chemical Specific ARARS. The general site discussion indicates there are PCBs remaining at the site. Please identify TSCA PCB regulations under 40 CFR 761.61 as an ARAR for this action.

Thank you for the opportunity to review this report. If you have any questions, please contact me at (415) 972-3150.

Sincerely,



Carolyn d'Almeida
Remedial Project Manager

cc: Chip Gribble, DTSC
Brian Thompson, RWQCB

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