



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

April 14, 2004

Mr. Jerry Dunaway, P.E.
Southwest Division
Naval Facilities Engineering Command
1220 Pacific highway
San Diego, CA 92101-8517

SUBJECT: ERA meeting of March 4, 2004, and Navy's letter of March 24, 2004

Dear Mr. Dunaway:

In response to your letter of March 24, 2004, to Chip Gribble, DTSC, we have the following comments and concerns:

1. We are pleased that the Navy intends to further characterize the sediments of Mare Island Strait and produce a baseline ecological risk assessment (BERA) for some of the defined cells along the Strait.
2. We do not agree with the exception of certain cells (Cells 31 through 37 in particular) from the group advanced for further study. If the screening level ERA presented enough uncertainties to advance to a baseline risk assessment, we see no reason to eliminate certain areas from further characterization. When screening level data suggests that problems may be found given the data presented, the logical and typical next step would be to advance the entire area to a baseline characterization. In any case certain cells not included in the group to be advanced include areas where the highest concentrations of PCBs and mercury have been found in the sediments. There is no logic to not including these cells for advancement.
3. We disagree that "it was the consensus of the participants at the March 4, 2004, meeting that these cells do not pose an unacceptable risk to ecological receptors and do not require additional ecological investigation". It was our observation that this discussion was quite heated and that no consensus was reached on eliminating certain of the cells from further study. In fact Chip Gribble made a point of clarifying to the Navy that he could not agree that these cells were "clean" or appropriate for no additional study. I tried to clarify at the meeting that adjacent areas

may become more important for additional study if data is received (during a BERA) which indicates a possible problem in the areas of the studied cells. For example, if one of the studied cells, when further evaluated, indicate contamination at levels of concern, we may need to further study adjacent cells in order to bound the area of contamination.

In summary, the Agencies were not agreeable to eliminating any cells from the possibility of additional study based on the current data. And, we at EPA have asked repeatedly that the Navy include cells 31-37 in the group of cells for additional study.

We look forward to your reply. We are quite interested in resolving these issues and seeing this area of Mare Island advance toward complete characterization.

Sincerely,

A handwritten signature in cursive script, appearing to read "Emily Roth".

for

Emily Roth
EPA Project Manager