



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

N00221_001289
MARE ISLAND
SSIC NO. 5090.3.A

April 14, 2008

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: Revisions to Navy's Responses to Comments on 2002 Draft Final Investigation Area A2 Former North Building Ways Area Remedial Investigation, Former Mare Island Naval Shipyard, Vallejo California, 2002

Dear Mr Bloom:

EPA still has remaining concerns with Navy's responses to Agency comments regarding the Investigation Area A2 Former North Building Ways Remedial Investigation.

1. The diagram of utility lines Navy provided in response to our comments is not sufficient to determine whether or not a vapor intrusion risk exists in the Investigation Area A2 parcel.
2. EPA is concerned that Navy seems to have expressed intent to comply only with TSCA PCB regulations at their PCB sites and ignore CERCLA requirements. The TSCA regulations do not supersede other environmental statutes. Please note that the TSCA PCB regulations in 40 CFR 761.61(ii) explicitly state:

"The self-implementing cleanup provisions shall not be binding upon cleanups conducted under other authorities, including but not limited to actions conducted under section 104 or 106 of CERCLA, or section 3004(u) and (v) or section 3008(h) of RCRA."

If you have any questions, please contact me at (415) 972-3150.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carolyn d'Almeida".

Carolyn d'Almeida
Remedial Project Manager

cc: Chip Gribble, DTSC
Brian Thompson, RWQCB