



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

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

N00221_003587
MARE ISLAND
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

October 27, 2005

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 Site Inspection of the Horse Stable Area, dated 8/2004

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: Mr. Gary Riley
Ms. Carolyn d'Almeida

**DTSC Comments on the Navy Mare Island
Draft Site Inspection of the Horse Stables Area, dated 8/2004**

1. Page 1, section 1.0, para. 2: Please revise the second sentence to state that DTSC is the lead regulatory agency for the State of California, and the U.S. EPA and the RWQCB provide regulatory support, for the cleanup at Mare Island.
2. Page 7, section 1.1.3.1, last sentence: The regulatory agencies have not made this conclusion. Please revise or delete the last sentence of this section.
3. Page 15, section 2.2.2: In general, a non-potable determination should not be a basis for not evaluating certain exposure route pathways. Instead, possible risks from these pathways may be sufficiently addressed by considering a non-potable determination and establishing institutional controls prohibiting such potable use.
4. Page 16, section 3.0: We agree with the EPA comment that industrial PRGs are not appropriate comparison criteria for this site, and that residential PRGs (California modified) should be used here instead for human health risk analysis. A human health risk assessment for unrestricted use should be added.
5. Page 39, section 6.0: Elevated concentrations of contaminants remain that present both human health risks as well as ecological risks. DTSC does not agree with the conclusion that no further investigation is recommended. It appears that a more detailed human health and ecological risk assessment is appropriate. However, we do agree with the Navy suggestion to consider a Removal Action for this site.

DTSC

DATE: 8/10/04