



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

August 22, 2005

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

RE: Draft Conceptual Site Model Technical Memorandum For Investigation Area K, Mare Island, Vallejo, California, February 2005

Dear Mr. Dunaway:

EPA has reviewed the above referenced report. The report presents a lot of detailed information which needs to be better presented to facilitate understanding and support decision making.

Specific Comments:

1. Figure 4: Location and Ranking of Investigation Sites: Please include the drainage areas and off-shore cell numbers on this figure. The ranking of sites from "best" to "worst" is somewhat helpful, but potentially arbitrary. There may also be more unknown sources in the industrial areas which could have contributed unquantified releases to the storm drains. The figures should show the locations of the storm drain outfalls with respect to the offshore cells.
2. Please list the IR sites and major contaminants of concern which could have potentially been released to the strait, organized by drainage area and impacted cell numbers.
3. The report should also include a summary and location and dates of all historic spills which had the potential to reach the storm drain lines, by drainage area and cell numbers.
4. Page 24 section 2.1.1, fourth sentence: "contaminant" should be "contaminate".
5. Figure 8: Dredging History Map: Please add the cell numbers to the figure.
6. Figure 9 Subcatchments and flows: This figure could probably be deleted as the same information is on Figure 10, which also shows the offshore cells. Cells and subcatchment flows from Figure 10 should be presented on the other figures as well. Actually, it would be most useful have one large figure that overlays all of the data from all of the figures combined.

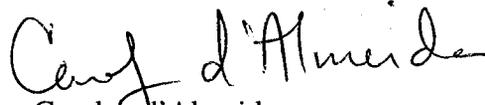
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7. Figure 11: Ranking of Storm water cells. This is helpful, but difficult to determine what criteria the ranking is based upon. Please include an narrative explanation of the ranking criteria. It would be helpful to show IR sites and principle known sources from Figure 12 on figure 11 as well.

8. Table 6: Cell by Cell Summary. The table suggests that there is little or no potential for recent or historic releases from IR sites or buildings to many of the off-shore cells, but there is no explanation given for these determinations. The report should include a narrative cell by cell analysis of potential contributing sources, dredging history, and available contaminant and ecological data for each cell to support decision making.

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

Sincerely,



Carolyn d'Almeida
Remedial Project Manager

cc: Gary Riley, RWQCB
Chip Gribble, DTSC