



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

January 20, 2005

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

RE: Draft Engineering Evaluation/Cost Analysis: Non-Time Critical Removal Action for the Fenced Scrapyard Area of the Defense Reutilization and Marketing Office Site, Mare Island, Vallejo, California, August 10, 2004

Dear Mr. Dunaway:

EPA has reviewed your draft Engineering Evaluation/Cost Analysis (EECA) for the removal action at the Defense Reutilization and Marketing Office (DRMO) scrap yard at Mare Island. We have the following comments:

General Comments:

1. Section 2.0 lists the previous documents which are relevant to the DRMO site, however the EECA provides very little detail about what work has actually been done there to date. Please provide more specific information about sampling and excavations that have already been undertaken in the next version of the report, including maps showing previously excavated areas, as well as what was found.
2. The EECA presents alternatives that allow for industrial reuse only. The development of alternatives discussion should also include a fifth option that would allow for unrestricted reuse, to give the public the full opportunity to comment.
3. It appears that Navy is asserting that the northern portion of the site already meets the cleanup criteria for industrial use and is proposing to screen these soils for MEC items and reuse the material for back fill elsewhere in the yard. It is not clear from the information provided in the report that there is enough information to make the determination that all of this material is clean enough for re-use.

Specific Comments:

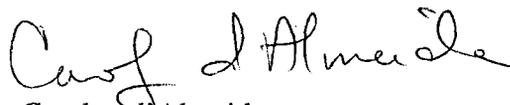
4. Section 2.3 indicates that pesticides, PAHs and TPH are also contaminants of concern at the DRMO yard, however only data for PCBs, lead and iron exceeding industrial criteria are graphically presented. Please show the data for the other contaminants of concern as well. Data should also be presented where concentrations exceed residential cleanup goals as well, in order to evaluate the feasibility of unrestricted reuse.

3. An IR 16 lead battery acid site has been associated the former Building 715 in the center of the DRMO yard. Have any investigations and/or cleanup activities been completed to address this site? Please discuss in more detail the work that was done.

2. Page 4 of Appendix B "Radiological Final Release Report" suggests that asbestos is a contaminant of concern at the DRMO scrap yard, but it does not appear to be mentioned elsewhere in the EECA report. Is there any data or reports which further evaluate this contaminant hazard at the DRMO yard? The possible presence of asbestos should be evaluated to address worker health and safety concerns prior to any excavation activity, as well as for cleanup decision making purposes.

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
Henry Chui, DTSC