



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

August 28, 2003

Jerry Dunaway, P.E.
BRAC Operations, Code 06CMJD
Southwest Division
Naval Fac. Eng. Com.
1220 Pacific Highway
San Diego, CA 92132-5190

SUBJECT: EPA Comments on July 18, 2003 Draft Action Memorandum for the CERCLA Time Critical Removal Action, Marine Corps Firing Range (MCFR)

Dear Mr. Dunaway:

Thank you for the opportunity to review the Navy's Action Memorandum for the Marine Corps Firing Range (MCFR) time critical removal action.

Our remaining concern is with air quality and the timing of this proposed interim remedial action. The work is likely to result in dusty, possibly lead contaminated, air conditions as the soil is removed, treated, sorted, etc. at the MCFR a short distance from the Mare Island elementary school which will be in session during the project's proposed seven (7) month duration, September 2003 through March 2004.

In a recent site visit to the 9th and Tisdale Lennar cleanup, Carolyn d'Almeida observed that the wind direction was directly from the MCFR toward the school, on at least this one day, and that the distance was such that any disturbance of soil in the MCFR area could potentially transport fugitive dust to the school area. We understand that the Navy will be taking all standard precautions in controlling fugitive dust emissions, however, air monitoring would ensure that these efforts are effective and provide the assurance to the school authorities that the work will not result in exposures to air borne lead contaminated soil for the children.

If the Navy believes that the work can be done safely and decides to proceed with the work as scheduled, we request that air monitoring before and during the removal be conducted to prevent potential exposures at the school. The air monitoring should be continuous during school operating hours and should be designed to determine if any of the site's contaminants of

concern in fugitive dust pose risks to the children at the school. We also request that the Navy prepare a contingency plan to address public notification and actions to be taken if dust emissions exceed acceptable levels.

We look forward to discussing this concern and the proposed resolution, that of air monitoring, with you, at your earliest convenience.

Sincerely,

Handwritten signature in cursive script that reads "Casey Almeida for".

Emily Roth

Remedial Project Manager

cc:

Henry Chui, DTSC

Charles Gribble, DTSC

Gary Riley, RWQCB