



# Department of Toxic Substances Control



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Secretary for  
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Protection

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N00221\_003632  
MARE ISLAND  
SSIC NO. 5090.3.A

July 14, 2003

Southwest Division  
Naval Facilities Engineering Command  
Attn: Mr. Jerry Dunaway  
1220 Pacific Highway  
San Diego, California 92132-5190

Dear Mr. Dunaway:

**NAVY MARE ISLAND DRAFT PROJECT WORK PLAN, TIME CRITICAL  
REMOVAL ACTION AT THE MARINE CORPS FIRING RANGE AND HISTORIC  
OUTFALL 4S, DATED 6/20/2003**

**NAVY MARE ISLAND DRAFT ACTION MEMORANDUM, TIME CRITICAL  
REMOVAL ACTION AT THE MARINE CORPS FIRING RANGE AND HISTORIC  
OUTFALL 4S, DATED 6/20/2003**

The Department of Toxic Substances Control has reviewed the subject documents. 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

## Attachments

cc: Ms. Brenda McConathy  
Mr. Henry Chui  
Mr. Mr. Gary Riley  
Ms. Emily Roth  
Ms. Carolyn d'Almeida

**DTSC Comments on the  
Navy Mare Island Draft Action Memorandum, Time Critical Removal Action at the  
Marine Corps Firing Range and Historic Outfall 4S, dated 6/20/2003**

1. Page 1-1: As the estimated cost for this Removal Action is greater than \$1M, DTSC is required to consider this as an Interim Remedial Action Plan. Please modify the title and text to reflect this.
2. Page 1-2, para. 3: Once the RAOs for this Removal Action/Interim Remedial Action Plan are met, the Navy will need to prepare a remedial Investigation report detailing the post removal action site characterization and residual risk. Additional remedial actions will be evaluated subsequently. Please modify the text accordingly. As an efficiency for this site, the TCRA report may be written to also serve as a Remedial Investigation Report.
3. Page 2-1, last para.: Part of this site has a planned reuse as a residential area. Please modify accordingly.
4. Page 2-4, section 2.1.3: As the history for a part of this site includes past use as a skeet range, PAHs should also be considered as a COPC. Further, at some point prior to a RI report, additional data will need to be generated with respect to other COPCs not presented in this section. Groundwater characterization at this site is incomplete also. Please add mention of this to the text in section 2.1.3.
5. Page 2-7, section 2.1.6, last para.: S/A comment number 3.
6. Page 3-2, para. 1: S/A comment number 2. In fact, we do anticipate a need for institutional controls for the Outfall 4S subarea, at a minimum.
7. Page 3-3, section 3.1.3, last para.: Removal of the discrete radiological items should be recommended also due to risk. Not removing these items to the extent proposed would likely result in a need for the property owner to obtain a permit approval from the DHS, and also would likely be considered unacceptable in terms of risk, by a variety of regulatory agencies.
8. Page 3-4, section 3.2.1: Please also state that a post Removal Action site-specific ERA will be conducted and included in a future site-specific Remedial Investigation report.
9. Page 5-2, para. 5: Soil from the skeet range subarea should be sampled **prior to** excavation in this subarea and evaluated for PAHs.
10. Figure 5-4: The timeline shown is unacceptable and must be shortened. Please revise to be consistent with discussions at the informal dispute resolution level.

**DTSC Comments on the  
Navy Mare Island Draft Project Work Plan, Time Critical Removal Action at the Marine  
Corps Firing Range and Historic Outfall 4S, dated 6/20/2003**

1. Page 1-1: As the estimated cost for this Removal Action is greater than \$1M, DTSC is required to consider this as an Interim Remedial Action Plan. Please modify the title and text to reflect this.
2. Page 1-2, para. 6: Soil from the skeet range subarea should be sampled **prior to** excavation in this subarea and evaluated for PAHs.
3. Page 1-2, para. 6: "Free of contamination" is not necessarily the same as non-hazardous. Soil with lead concentrations below 200ppm is not free of contamination either. Please revise for clarification.
4. Page 1-4, section 1.2: The timeline shown is unacceptable and must be shortened. Please revise to be consistent with discussions at the informal dispute resolution level.
5. Page 3-2, section 3.3: Currently, we do not have any of the appendices for review. Please submit all appendices immediately for agency review and comment.
6. Page 3-8, section 3.7.2: Please state that the WMP is included in the EPP in appendix D, if this is a true statement.
7. Page 4-11, para. 1: Imported soil should have inorganic concentrations comparable to or less than the established ambient/background values; Imported soil should have no organic contaminants; The fill source needs to be identified and source area history must be presented; An imported soil plan must be proposed to DTSC for approval prior to actual importation The sampling frequency must also be discussed in the corresponding appendix or proposed plan
8. Page 4-13, section 4.12.5: See comment number 7.
9. Page 4-15, section 4.14, last para.: Please identify the off-site disposal facilities for the various waste streams.