



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

August 24, 2004

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

RE: Draft Final Technical Memorandum Evaluation of Offshore Data Gaps, Mare Island, Vallejo, CA; (July 2004)

Dear Mr. Dunaway:

EPA has reviewed the above referenced report and offers the following comments.

General Comment:

1. The Navy needs to unambiguously state that the outfalls in cells 31 through 38 will be investigated for PCBs and other constituents of concern.
2. Page 2 - the statement that "It was the consensus of the participants at the March 4, 2004 meeting that these cells (...North Mare Island Strait cells...31 through 37") do not pose an unacceptable risk to ecological receptors and so do not require additional ecological investigation" is not correct. EPA stated at the meeting and also in a letter dated April 2, 2004 that EPA did not agree with the Navy's contention that cells 31 through 37 should not be investigated further. EPA continues to insist that these cells should be included in either the BERA or the PA/SI and investigated for PCBs and other COPECs for the following reasons:

Specific Comments:

1. There are eight outfalls located in these cells as depicted on Figure 6-2 in the Offshore ERA. These outfalls have been characterized in earlier Navy reports as having significant levels of PCBs in sediments adjacent to the outfalls. In the meeting minutes of March 4, 2004, distributed by the Navy by letter of March 24, 2004, the Navy stated that these outfalls would be characterized (page 3, Path Forward for the Offshore Areas, third bullet). However, this report says the cells containing these outfalls "may" be included in the investigation of these outfalls. It seems that if these cells are being investigated for PCBs related to outfalls, then they are being investigated. The language is vague and misleading and should be revised to clearly state the

cells are being investigated for PCBs and for the constituents indicated above.

2. As noted in previous reviews, these cells (with exception of cell 34) only had one sample taken for characterization. Reviewers have noted that this was a minimal number of samples for characterizing such large cells. Most of the cells showed metals and pesticides failing the ER-Ls. Cell 34, sampled at depth, showed some COECs above the ER-M. This would be an opportunity to analyze these sediments again for the full range of constituents of concern and verify the finding of no risk.

In addition, EPA also noted in the letter of April 4, 2004 that the agency does not agree with excluding any cells from further investigation if new information is found to indicate risk. The conclusions of no risk drawn by the Navy in the Offshore Ecological Risk Assessment were not accepted by the Agency. The Navy must demonstrate to the Agency's satisfaction that this conclusion is supportable.

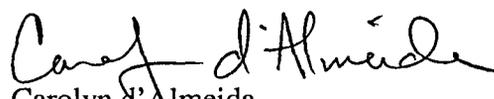
Page 8, first bullet: this sentence seems to contradict the sentence on page 2 (as noted above) that the Navy may investigate these cells further. Please clarify.

Page 15, Section 2.3.2 Evaluation of Select Data (North Mare Island Strait), next to last sentence: this sentence is in error. Cell 34 (not reviewed in this section) showed nickel concentrations exceeding the ER-M.

Page 21, Section 3.0 Baseline Ecological Risk Assessment Planning: As noted above, this section also contradicts the sentence on page 2 where the Navy states the stormwater outfalls may be investigated. Please clarify.

If you have any questions, I can be reached at (415) 972-3150.

Sincerely,

  
Carolyn Almeida  
Remedial Project Manager

cc: Gary Riley, RWQCB  
Chip Gribble, DTSC  
Henry Chui, DTSC