



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

February 13, 2007

Mr. Michael Bloom  
Dept of the Navy  
Base Realignment and Closure  
Program Management Office  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4301

RE: Draft Data Quality Objectives to Support the Baseline Ecological Risk Assessment and Outfall Sediment Investigation at Investigation Area K, Former Mare Island Naval Shipyard April, 2006

Dear Mr Bloom:

EPA has reviewed the above referenced document and offers the following comments:

General Comment:

1. EPA supports the State's request for additional sample collection.
2. Please clearly define throughout the document the difference between "shallow" and "deep" waters so the agencies can provide better informed input on the proposed sampling design.

Specific Comments:

1. Figure 1 - cells 42 and 43 are identified as "No Additional BERA Evaluation Necessary". These cells are included in the Area IA F2 Remedial Investigation currently underway. They should be so identified rather than leaving a false impression that no further work is necessary for these cells. This information is presented in the text on page 3, Section 2.0, third paragraph.
2. Page 5, Table 1, Step 2, Bulk Sediment Chemistry, (2): please provide a listing of the chemical concentrations which exceed the ER-L as well as the ER-M. This would correlate with the Assessment and Measurement Endpoints (ME 1a) listed on page 15 and Table 5 and provide information useful for both the risk assessors and the risk managers when discussing the weight of evidence.
3. Page 5, Table 1, Step 2, Bulk Sediment Chemistry, (3): Please quantify the statement "Does enough valid data exist to support a BERA analysis within IA K?".

4. Page 5, Table 1, Step 2, Bioaccumulation and Dose Assessment, (5,6,7): evidence of bioaccumulation is not sufficient in and of itself to determine risk. Do not use these criteria to determine whether there is risk to biota. That will be determined by the food chain modeling.
5. Page 6, Table 1, Step 5, Develop Decision Rules, (5); please define what "detected" means.
6. Page 6, Table 1, Step 5, Develop Decision Rules, (2): Please include all chemicals that are equal to the ER-L to correspond with the proposed assessment and measurement endpoints proposed for benthic invertebrates and Table 5.
7. Page 7, Table 1, Step 5, Develop Decision Rules, (7): Bioaccumulation in and of itself does not determine risk. Please delete this step.
8. Page 7, Table 1, Step 5, Develop Decision Rules (8), fourth paragraph: "A chemical concentration is elevated above its respective ER-M value." As noted above, it would be helpful when assessing the weight of evidence to have all chemicals identified which exceed both the ER-L and the ER-M.
9. Pages 7 and 8, Table 1, Step 5, Develop Decision Rules (8), seventh, eighth and ninth paragraphs: based on the comments above, please delete these decision rules. Bioaccumulation in and of itself does not determine the risk of adverse effects to biota.
10. Page 9, Table 1, Step 7, Step 7, Optimize the Sampling Design: in point of fact, the statement "The current design was optimized by providing even spatial coverage of IA K..." is incorrect. The sampling design incorporates different sampling strategies based on whether the outfalls discharge into deep water or on mudflats or shallow water. The sampling in deeper water will be random and designed to provide even coverage. The sampling pattern for the rest of the outfalls will be designed to focus on the outfall itself. Please correct this statement.
11. Page 8, Table 1, Step 6, Specify Tolerable Limits on Decision Errors: the agencies must be consulted and be in agreement with the determination of whether either of the hypotheses are true or false when evaluating the weight of evidence.
12. Page 12, Table 3: EPA supports the DFG-OSPR's request to replace the proposed killdeer and double crested cormorant in this habitat with the osprey and a sandpiper.
13. Page 35, Section 3.2: Please separate the discussion of the strategy for outfalls discharging onto mudflats from that discussing shallow water. They are not the same.
14. Page 36: please present the methods for determining whether metals and organics co-occur.
15. Page 36: please clearly state that the Navy will consult with the agencies to determine what the final decisions should be before they are made. The Navy has been very proactive to this point in consulting with the agencies on determining the way forward for this investigation and EPA would like to see this collaboration continue.

If you have any questions, please contact me at (415) 972-3150.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carolyn d'Almeida', written in a cursive style.

Carolyn d'Almeida  
Remedial Project Manager

cc: Chip Gribble, DTSC  
Brian Thompson, RWQCB