



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

N00221_004179
MARE ISLAND
SSIC NO. 5090.3.A

June 16, 1998

Mr. Robert Pender
Environmental Restoration Branch
EFA., West
Naval Facilities Engineering Command
900 Commodore Drive, Code 1824.3
San Bruno, CA 94066-5006

Dear Mr. Pender:

EPA has reviewed the "Basewide Polychlorinated Biphenyl Confirmation Sampling Summary Report- Investigation Area, A-2" for Mare Island. Please incorporate the following comments in a report revision:

1) Parcel 01-Q2;

A. General Sampling Concerns: Appendix A for Parcel 01-Q2 recommended actions which are reiterated on page 01-Q2-1 of the Confirmation Sampling Summary Report. Please document whether these actions were taken. The sample concentrations in this area were quite elevated. For example, SSPTS sampled the 460 volt cable insulation and PCB data results show concentrations of 329,000 to 360,000 mg/kg.

Also, there is a major difference between data results from the SSPTS and Tetra Tech sampling efforts at several locations within this parcel. Please reevaluate this data. It appears that some of the differences may be due to the matrix sampled and possibly some of the materials previously sampled have been removed; however, additional samples may be warranted in some of the sampling locations if materials have not been removed.

B. Ecological Receptor Issues; During review of the April 1998 "draft Offshore Areas, Ecological Risk Assessment," it was observed that the PCB levels in the sediments under these piers are significantly greater than those found in all other offshore sediments. Data from the sampling station, FR02, showed total PCBs greater than the ERM value. The agreed upon 1 mg/kg screening level is appropriate for human receptors, however, on an area such as Parcel 01-Q2 with close proximity to the strait, ecological screening levels are most appropriate (this is also substantiated by the PCB data results as mentioned above).

C. Human health issues; There are exceedences of the 1 mg/kg PCB screening levels inside Building 799; PC9014 at 10 mg/kg--concrete floor. Outside Building 799, 2 samples with concentrations above 1 mg/kg; PC9006 (2 mg/kg--concrete) and PC9008 (2 mg/kg--soil sample).

Robert Pender
Page 2
June 16, 1998

The primary issue, however, for evaluating this parcel is to determine if any current or potential future exposure routes exist. Is there currently access to the high levels of PCBs by either ecological or human receptors? Also, are these concrete piers scheduled for demolition? Please provide an update of the Navy's plan for this area. If you have any questions regarding these comments, I can be reached at (415)744-2368.

Sincerely,



Bonnie Arthur
Remedial Project Manager

cc: Mr. Chip Gribble, DTSC
Mr. Michael Rochette, RWQCB