



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

June 6, 1994

Mr. Stephen Chao
Naval Facilities Engineering Command
Western Division
900 Commodore Way, Bldg. 101
San Bruno, CA. 94066

Re: Clarification of SWEA Screening Criteria

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) received by fax on May 25, 1994 questions raised by the Navy regarding the "Regulatory Agencies Position on the Selection Criteria for the Phase I Ecological Assessment", dated May 6, 1994. Although no official correspondence has been received, below is a clarification of the issues raised.

Organics in the Landfills - The regulatory agencies' use of RAGS Volume I (Part A) in screening common laboratory contaminants is to communicate the process necessary, not the actual numbers. If EPA RAGS Volume I (Part A) is not used as guidance, the stringency can actually increase. Unless the Navy wishes to use a more stringent guidance, RAGS Volume I (Part A) should be considered applicable.

Organics in Groundwater and Surface Water - By referencing the December 1991 EPA Eco Update as a source of criteria to be used here, the agencies assume the Navy is including AWQC among those listed (see page 4 of the Update). As stated before, it can be considered the primary benchmark for screening.

Organics in Sediment - See comment above regarding RAGS Volume I (Part A) for organics in the landfills. Regarding the "verification step", ultimately the Navy needs regulatory agency buy-in on the verification step utilized.

EPA hopes that this provides clarification on these remaining SWEA Phase I issues. It is assumed that the remainder of the criteria in the agencies' May 6, 1994 letter are understood by the Navy to be applicable to the Phase I SWEA. The abridged Draft Final Phase I SWEA incorporating these screening criteria was supposed to be submitted on June 1, 1994. It has not yet been received by EPA.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Gill".

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

Printed on Recycled Paper

cc: C. Joseph Chou (DTSC), K. Eichstaedt (URS), R. Gervason (RWQCB), J. LeClaire (Fax)

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