

## CARGILL SALT

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March 8, 2001

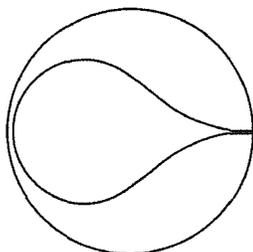
Ms. Andrea Muckerman  
BRAC Environmental Coordinator  
Southwest Division, Naval Facilities Engineering Command  
BRAC Operations Office  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101-8517

Dear Ms. Muckerman:

I am writing to present comments and questions generated during a preliminary review of the draft Feasibility Study Report for the Northern Channel located on Cargill Property. We may have additional comments after a full review of the Draft Feasibility Study and supporting documents has been conducted.

As this is the first opportunity Cargill has had to review any information regarding contamination in the Northern Channel, we have several questions regarding the Feasibility Study.

- 1) Were any samples taken of the surface soil on the levee or alongside the ditch? Was there any sampling of the sediment further downstream in the ditch?
- 2) The draft Feasibility Study presented several remediation alternatives. What would be the timing of the remediation activities? In what season and year would the remediation be performed? If the selected alternative required construction of a CAMU, where would the CAMU be located? If the selected alternative involved dewatering of excavated sediment in a CAMU, where would the decant water go? Cargill would be opposed to these activities being located on our property.
- 3) We have not had enough time to evaluate your proposed RAOs and clean up goals. We may have further comments on the RAOs and the clean up levels once we have had a chance to review the Draft Feasibility Study in more depth.
- 4) Generally, Cargill's preference would be for a remediation alternative that involved excavation and removal of the contaminated material. The Northern Channel is part of a larger piece of property that is under consideration for acquisition by the U.S. Fish and Wildlife Service and California Department of Fish and Game. We do not know what their requirements may be for acquisition and clean up levels for contaminated property.



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The Draft Feasibility Study briefly touches on future considerations for the ditch, such as source control to prevent additional contamination. The study should also address any surface water contamination as the storm water flows to the Bay. We assume that the Navy has additional BMPs that address and limit contact of pollutants to rain water upgradient of the proposed berms and prevent future contamination. A broader issue and one that we will need to address is the use of Cargill's property for conveyance of off-site storm water. The property issue is one that we will have to address independently of the clean up.

Finally, we think it is prudent for the Navy to have signs or fencing erected at the Northern Channel to warn our employees and other users of the property about the contamination in the channel.

Thank you for the opportunity to review and comment on the Draft Feasibility Study for the Northern Channel. Given the volume of information presented and the limited amount of time to review this information, it is anticipated that we may have additional comments throughout this process. If you have any questions, please feel free to call me at (510) 790-8182.

Sincerely,



Barbara Ransom  
Environmental Manager  
Cargill Salt

cc: Angela Patterson, Remedial Project Manager