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From: Francesca D'Onofrio [mailto:FDonofri@dtsc.ca.gov]
Sent: Friday, May 19, 2006 10:40
To: Hurst, Michelle L CIV NAVFAC SW
Subject: Site 11A Tech Memo

As a follow up to our conversation this morning, I have the following comments to provide. In the interest of time, I am sending these to you via e-mail. Please provide the changes (can be done electronically) and once I've reviewed the new language, I will send our comment letter. By doing it this way, we can avoid the time of U.S. mail. Please do not finalize the document until DTSC has been given a chance to review the following revisions:

1. Page 2-2, second paragraph. It is stated "Based on the results, arsenic, benzo(b)fluoranthene, and benzo(a)pyrene.....were identified as contaminants of potential concern in soil at different areas within the current and former sewer system. A more detailed evaluation of the soil data is included in Section 3.0." However, the text in Section 3.0 does not clearly state the results of the 2001-2002 soil sampling and does not explain away the "potential concern" that is presented on page 2-2.

2. Section 4.0, Summary and Recommendations. The wording in this section does not support the results of the sampling results. The text states "The estimated concentrations of benzo(a)pyrene in 2 of 52 samples exceed the residential PRGs.....". However, the 2001-02 sampling results included in Appendix F indicate levels below residential PRG's. The Summary and Recommendations section needs to include a discussion of ALL sampling efforts and reach the final recommendation based on this. It is unclear why the text would conclude benzo(a)pyrene is present at concentrations of concern when the 2001 sampling results indicate the opposite. Based on all the info and data presented in the report, DTSC concludes no further action is recommended but the document needs to clearly provide a narrative conclusion which summarizes all sampling results.

3. Section 2.7. Include in the narrative the number of samples that were collected in the 2001-02 effort.

4. Appendix A is titled "Current and Former Sewer System Site Investigation Data". This title should accurately reflect the data presented is for 1999 only.

Please let me know if you have any questions pertaining to my comments.

Thank you,
Francesca