



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

November 5, 2003

Mr. Jerry Dunaway  
Southwest Division, Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, CA 92101-8517

Subject: Draft Final Site Inspection Report, Manhole D1-C85 and Outfalls 22,23,25, and 26, Investigation Area C2, June 2, 2003

Dear Mr. Dunaway:

EPA has reviewed the Navy's Draft Final Site Inspection Report, Manhole D1-C85 and Outfalls 22, 23, 25, and 26, Investigation Area C2, dated June 2, 2003. EPA agrees with Navy's conclusion that this area needs further investigation. However, this area also merits certain early actions, appropriate in a remedial investigation, such as the installation of groundwater monitoring wells, and additional sampling.

Our comments on this document are similar to our January 23, 2003 comments on the earlier report of October 2002. Outfall 27 is very definitely potentially affected by the contamination found at Manhole D1-C85. Further investigation is not necessary to determine the need to sample the sediments adjacent to outfall 27. In addition, soil and groundwater boring sampling is needed along the storm drain corridor toward outfall 27. The area of manhole D1 C85 drains toward outfall 27 as well as the plugged outfall 26. It is a very troubling oversight that the Navy has not yet characterized the path to outfall 27 and the sediments adjacent to 27.

In addition, groundwater monitoring wells are needed in the area of Manhole D1 C85, to fully characterize the extent of VOC contamination in this area. Soil gas sampling could be used to determine the extent of the area of soil contamination. Soil vapor extraction could be utilized to remove VOCs from the soil in this area.

The Navy needs to take action at this area to prevent the further migration of contaminants toward the Strait or into the air. This contamination in the vicinity of manhole D1 C85 has been known to the Navy for a sufficient period of time to have fully characterized the area and to have elevated the site to that of an IR site. The presence of vinyl chloride and other VOCs in the groundwater in this area is of considerable concern to this Agency, and we urge the Navy to propose appropriate remedial actions to fully characterize and remediate the contamination at this location.

Thank you for the opportunity to review this report. If you have any questions, please call me at (415) 972-3175.

Sincerely,



for

Emily Roth  
Remedial Project Manager

cc: Carolyn d'Almeida, EPA  
Sonce deVries, EPA  
Gary Riley, RWQCB  
Chip Gribble, DTSC  
Henry Chui, DTSC