



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105

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MARE ISLAND  
SSIC NO. 5090.3.A

February 2, 2006

Mr. Jerry Dunaway  
Dept of the Navy  
Base Realignment and Closure  
Program Management Office  
1455 Frazee Road, Suite 900  
San Diego, CA 92108-4301

RE: Review of the Draft Final Work Plan, Remedial Investigation Phase II for Southern Offshore Sites, Former Mare Island Naval Shipyard, Vallejo, California, 11 January 2006

Dear Mr Dunaway:

EPA has reviewed the above referenced report. We have the following remaining comment on this document:

1. **Section 1.1 Project Background, Page 4:** In the comments provided by the EPA on the previous draft of the Draft Final Work Plan, Remedial Investigation Phase II for Southern Offshore Sites, Former Mare Island Naval Shipyard, Vallejo, California, 11 January 2006, the following comment was submitted on Section 1.1:

**Section 1.1 Project Background, Page 3:** The fourth paragraph of this section begins with, "The term 'UXO' was used in previous investigative reports as a general term for any MEC item (formerly called ordnance and explosives [OE] found at Mare Island." The remainder of this paragraph provides a definition of UXO and then notes that UXO have never been found at Mare Island. While this assertion is very likely correct, the definition of UXO provided in the paragraph does not match the one found in the Glossary of Terms on page ix of the Draft Work Plan. Of particular concern is the use of the word "or" in place of the word "and" just prior to the portion of the definition preceded by "(3)." This use of "or" where "and" should be used changes the definition in an unacceptable manner. Please review the definition found on page ix of the Draft Work Plan and in the section cited above, and ensure that both match the official definition found in 10 U.S.C 101(e)(5)(A) through (C).

A review of the cited section in this latest version of the document reveals that the word "or" has not been replaced as requested. To assist in this corrective action, the wording found in 10 U.S.C 101(e)(5)(A) through (C) is reproduced below for your information:

Unexploded Ordnance (UXO). Military munitions that (A) have been primed, fused, armed, or otherwise prepared for action; (B) have been fired, dropped, launched, projected, or placed in such a manner as to constitute a hazard to operations, installations, personnel, or material; and (C) remain unexploded whether by malfunction, design, or any other cause. (10 U.S.C. 101(e) (5)(A) through (C)).

Please make the requested correction to the definition of UXO included on page 4 of Section 1.1 of the Draft Final Work Plan, Remedial Investigation Phase II for Southern Offshore Sites, Former Mare Island Naval Shipyard, Vallejo, California, 11 January 2006.

Thank you for the opportunity to review this report. If you have any questions, please call me at (415) 972-3150.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn d'Almeida".

Carolyn d'Almeida  
Remedial Project Manager

cc: Chip Gribble, DTSC  
George Leyva, RWQCB