



Alan C. Lloyd, PhD
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

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Berkeley, California 94710-2721

N00221_000806
MARE ISLAND
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

March 22, 2006

Mr. Jerry Dunaway
Department of the Navy
BRAC Program Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310

Mare Island Navy Draft Final Site Inspection Report for the Mare Island Elementary School, dated 1/11/2006

Dear Mr. Dunaway:

The Department of Toxic Substances Control has reviewed the subject document. We understand that the Navy intends to revise the document to present data that represent current environmental conditions following the 2003 Tisdale and 9th Streets site remedial excavation activity conducted by CH2MHill on adjacent property and the elementary school property.

Please include revisions in the final report that address our attached additional comments. Should you have any questions or concerns regarding our comments, please call me at (510) 540-3773.

Sincerely,

Chip Gribble
Remedial Project Manager
Base Closure Unit
Office of Military Facilities

Attachment

cc: See next page.

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BRAC OFFICE

Mr. Jerry Dunaway

March 22, 2006

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cc: Mr. George Leyva
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612

Ms. Carolyn d'Almeida
U. S. Environmental Protection Agency
413 Poppyfield Drive
American Canyon, California 94503

Comments on the Navy Mare Island Draft Final Site Inspection Report for the Mare Island Elementary School, dated January 11, 2006

1. Page 1, last sentence: If the Navy conducted further sampling “to confirm concentrations do not pose unacceptable risks to human health”, then the study may be invalidated and rejected as biased. A more appropriate basis to conduct additional sampling may be to address identified data gaps to evaluate concentrations of chemicals in soil and groundwater. Please revise accordingly.
2. Page 4, section 2.2, para. 2: The Mare Island **ambient/background concentration** for a given inorganic constituent is defined as a data set with a specified 95th percentile and a mean value. A site characterized by an inorganic constituent with a mean concentration above the corresponding **ambient/background** mean value yet also with all discrete sample concentrations below the corresponding 95th percentile for the ambient/background data set may be considered as contaminated with respect to that inorganic constituent. Please evaluate this interpretation of data and discuss in the next revision of the SI report.
3. Page 5, para. 2: Organics should be compared to the **Cal-modified** EPA Region IX residential PRGs.
4. Page 7, para. 3, line 5: Please note that demolition and construction of buildings and storage tanks **did** result in placement of some fill material across this site.
5. Page 14, section 3.5.9, para. 2, 1st sentence: It is our understanding that some fuel line segments remain in place and these have been inspected and flushed.
6. Page 20, section 4.2.1.2: The text only addresses discrete sample concentrations in comparison to the 95th percentile for the ambient/background levels for Mare Island fill soils. The evaluation should also include an analysis of spatial distribution as well as comparison to the mean concentrations for the ambient/background levels for Mare Island fill soils.
7. Page 28, para. 2, 4th line: Reference of Tetra Tech 1998a is not given in the References section 7.