



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

N00221_000815
MARE ISLAND
SSIC NO. 5090.3.A

March 30, 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

2006 APR -4 P 2:14
DRAC OFFICE

RE: Review of the Draft Final Investigation Area A2 Former North Building Ways Area Remedial Investigation, Mare Island, Vallejo, California, March 18, 2002

Dear Mr Dunaway:

EPA has reviewed your responses to our comments on the above referenced report. Our comments on the draft report are addressed with the exception of a few remaining comments on the Ecological Assessment.

General Comment:

The overall on-shore and off-shore ecological risk assessments this document relies upon have not yet been finalized and accepted by the regulators, and therefore the ecological conclusions drawn in this document are not yet final. Navy should consult with the agency risk assessors to determine whether the risk conclusions in this RI can be accepted as is, and the supporting information needs to be included in the final RI rather than referring to the draft ecological risk assessment reports (ERAs).

Specific Comments:

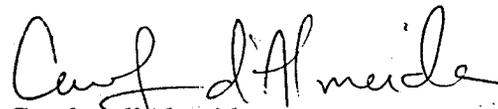
1. Attachment A, Minor Comments, Comment no. 6: "Please include a table comparing sediment values against NOAA's ER-Ls and ER-Ms. One of the tables from the offshore ecological risk assessment may be useful". The Navy declined to do this because the tables were presented in the onshore and offshore ecological risk assessments. These documents are no longer relevant. The tables should be presented in this document or the Navy may revise to reference the Area K ecological risk assessment when it is available some time in the future.
2. Attachment C - Ecological Risk Assessment Comments, Responses to General Comments:

Previous Comment #1: the comment refers to the use of a "ranking scale" defining risk based on verbal descriptions. The Navy needs to compare the low TRV to the exposure dose for each receptor. The Navy response refers to food-chain modeling presented in the offshore ERA and results presented in the onshore ERA. To make this document stand-alone, either it has to be revised to include the information in the old onshore and offshore ERAs or it has to refer to the new Area K investigation conclusions when they are available.

Previous Comment #2: the EPA comment requests more information regarding the decision making for the determinations presented in the draft RI. The Navy response refers to the conclusions and supporting information being presented in the draft final onshore ERA. The Navy must either include this information in this draft or wait until the Area K investigation is complete. Since risk conclusions may change, it would be advisable to wait.

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