

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



June 12, 2007

Mr. Michael Bloom
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 Work Plan Time-Critical Removal Action Installation Restoration Site 04, Installation Restoration Site 05, Parcel XVI Paint Waste Area, Defense Reutilization and Marketing Office Scrapyard and Horse Stables Area, May 2007

Dear Mr Bloom:

EPA has reviewed the above referenced report and offers the following comment:

EPA is very pleased that the Navy is proceeding with removal of greensand in portions of IR-04. This removal is a major step in the direction of removing risk to biota in these areas. However, EPA would also like to remind the Navy that the ecological risk associated with greensand in all of IR-04 including the upland, wetland, and subtidal habitats has been the subject of discussion since 1996 and in that time the agencies and the Navy have not reached complete agreement on the potential risk to ecological resources in all the habitats included in this site. The habitats include the upland, the wetlands and the subtidal (offshore). The Navy and EPA agree there is risk to biota in the uplands and the wetlands. We continue to disagree on potential risk in the subtidal zone.

This workplan does propose to address the contamination in at least a portion of the uplands but does not propose to remove the contaminants in the balance of the uplands, wetlands or the subtidal zone. We urge the Navy to revisit the decision for all of these habitats. There is proven risk to biota in the uplands, and the wetlands are the habitat of the salt marsh harvest mouse, a Federally-listed endangered species, and should be remediated as soon as possible. The Navy should initiate informal consultation with the US Fish and Wildlife Service to discuss how this wetland may be remediated to eliminate the risk to the mouse.

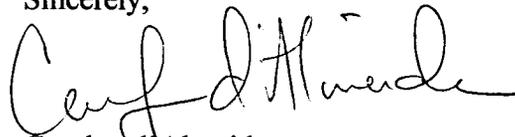
With regard to the subtidal zone, EPA continues to insist that the Navy has not produced solid evidence that this habitat does not harbor risk to aquatic biota. This opinion is supported by DTSC in a number of comments over the past years. EPA urges the Navy to consider removing the greensand in the subtidal zone to eliminate a known contaminant source which could be adversely affecting aquatic biota both now and in the future. We prefer to see resources utilized

as efficiently as possible to physically remove and isolate a potential source of toxicity to avoid further delays and additional costs of continuing studies.

Again, we commend the Navy for proposing this current interim action and strongly urge the Navy to seriously consider completing the removal now. If the greensand remains in place in the subtidal zone, EPA will expect the Navy to either perform studies to support the contention of no risk or complete the removal in the future.

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 black ink, appearing to read "Carolyn d Almeida". The signature is fluid and cursive, with a large initial "C" and a distinct "d" before the last name.

Carolyn d Almeida
Remedial Project Manager

cc: Chip Gribble, DTSC
Brian Thompson, RWQCB
Becky Stanton, DFG
Frank Gray, DFG