



Linda S. Adams  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Maureen Gorsen, Director  
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Berkeley, California 94710-2721

N00221\_001138  
MARE ISLAND  
SSIC NO. 5090.3.A



Arnold Schwarzenegger  
Governor

August 27, 2007

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

### **Mare Island Navy Draft Final Remedial Action Plan/Record of Decision for Installation Restoration Site 17, dated 5/1/2007**

Dear Mr. Bloom:

The Department of Toxic Substances Control has reviewed the subject document. The attached comments are forwarded to you for your consideration.

Should you have any questions regarding this letter, please call me at (510) 540-3773.

Sincerely,

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

cc: See next page

Mr. Michael Bloom  
August 27, 2007  
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cc: Mr. Brian Thompson  
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

Mr. Dennis Kelly  
Tetra Tech EM Inc.  
135 Main Street, Suite 1800  
San Francisco, CA 94105

**DTSC Comments on the  
Mare Island Navy Draft Final Remedial Action Plan/Record of Decision for  
Installation Restoration Site 17, dated 5/1/2007**

1. Please add an executive summary that includes the selected action and approvals. Please use the H1 RAP for a template. Please also delete the Appendix C: DTSC Agreement with the Selected Remedy.
2. Page 1-1, section 1.2, para. 1: Please change the phrase "...selected remedy was chosen..." to "The preferred remedy was developed in accordance with ..."

Please also modify the 3<sup>rd</sup> sentence to state that the preferred remedy and this document was developed in accordance with Chapter 6.5 and 6.8 of the CA H&S Code.

3. Page 1-1, section 1.2, para. 2: Please revise the sentence to indicate that DTSC, RWQCB, and USEPA have evaluated the selected remedy instead of agree with.
4. Page 1-1, section 1.3: Please delete sentences numbers 3 and 4. Please also modify sentence 5 to indicate that the LNAPL does pose an unacceptable risk.
5. Page 1-2, para. 2: Please delete this paragraph. All contaminants present must be evaluated in a complete post-remediation risk assessment.
6. Page 1-2, section 1.4, para. 1, sentence number 3: DTSC does not agree that risks from some specific pathways have been defined. Post-remediation risks from all contaminants present must be evaluated in a complete post-remediation risk assessment. Please revise accordingly. Further, regarding future use restrictions and institutional controls, reuse of this site should be prohibited until a determination has been made, based on a completed risk assessment, that residual risks are acceptable for a given future use. It is our understanding that this prohibition on reuse at IR17 currently exists through an absence of an approved Navy FOSL.
7. Page 1-2, section 1.4, para. 2, last sentence: The reference to designing post-remediation site conditions should be rewritten or clarified
8. Page 1-2, section 1.5, para. 2: This paragraph should be deleted, as a subsequent remedial action decision document may follow that may address any or all of the following: residual contamination/residual risk, restrictive land use covenant and institutional control, long term operation and maintenance, and monitoring, at a minimum.
9. Page 1-5, section 1.7: S/A comment number 1.
10. Page 2-1, section 2.1: S/A comment number 2 and comment number 3.

11. Page 2-12, section 2.3.3: Please revise with respect to current dates for the public comment period, public meeting, etc. The list of appendices should also be revised. Please use the IA-H1 RAP for a template. Please add to the final draft for public review prior, a copy of the public notice, a copy of the fact sheet, and information on the planned public meeting.
12. Page 2-21, section 2.7: An adequate risk assessment for this site has not been completed due to complications resulting from the presence of free product and LNAPL, and that this proposed RAP/ROD is intended to reduce contaminant concentrations to a point that would allow/facilitate completing a risk assessment for the IR17 area. As the Navy and regulatory agencies have not yet come to an agreement on the site risks and risk assessment, the site risk presentation in section 2.7 should be deleted. The site risk assessment and acceptability of these risks should be addressed following this proposed remedial action and post-remediation risk assessment and evaluation.
13. Page 2-29, section 2.8: Please delete bullets 2 and 3. We agree that the only RAO should be to reduce the volume of free product to the maximum extent practicable.
14. Page 2-34, section 2.10: Please modify for consistency with comment number 12. The site risk assessment and acceptability of these risks should be addressed following this proposed remedial action and post-remediation risk assessment since the Navy and regulatory agencies have not yet come to an agreement on the site risks and risk assessment for this site.
15. Page 2-38, section 2.12, para. 1: Please revise to reflect the fact that this remedy has not yet been approved but only proposed. A public comment period has not yet been held.
16. Page 2-38, section 2.12: Please revise this section for consistency with previous comments. The proposed remedy should not include institutional controls, monitoring, or 5 year reviews. The first bullet should include not just a post-remediation HHRA but also an ERA, as well as an assessment of impact to groundwater.
17. Page 2-39, table 2-7: Please modify for consistency with previous comments.
18. Page 2-42, section 2.13: Please revise this section for consistency with previous comments. The proposed remedy should not include institutional controls, monitoring, or 5 year reviews. The first bullet should include not just a post-remediation HHRA but also an ERA, as well as an assessment of impact to groundwater.
19. Page 2-60, section 2.14: Please revise for consistency with previous comments. This document should be revised for consistency with a final draft document to be available for public review and comment.