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MARE ISLAND
SSIC NO. 5090.3.A



Department of Toxic Substances Control



Alan C. Lloyd
Agency Secretary
C&EPA

700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721



Arnold Schwarzenegger
Governor

February 18, 2005

Mr. Jerry Dunaway
U.S. Department of Navy
BRAC Program Management Office West
1230 Columbia Street, Suite 1100
San Diego, California 92101-8571

Dear Mr. Dunaway:

Mare Island Draft Final Site Management Plan, dated 1/25/05

Navy Responses to DTSC Comments on the Revised Draft FY05 SMP

The Department of Toxic Substances Control has reviewed the subject documents. 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

Attachment

cc: Mr. Gary Riley
Ms. Carolyn d'Almeida
Mr. Dwight Gemar

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 3	
To	Jerry Dunaway	From	Chip Gribble
Co.	Navy Southwestern	Co.	DTSC
Dept.		Phone #	510-540-3773
Fax #	619-532-0940	Fax #	

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**DTSC Comments on the
Navy Responses to DTSC Comments on the Revised Draft FY05 SMP**

1. Comment/RTC number 8: The Navy response is adequate with respect to a revised SMP that is approvable. Remaining concerns with the content of some of the offshore documents mentioned in the RTC will be restated in forthcoming review comments on particular offshore documents. No further response is necessary.

2. Comment/RTC number 9. Based on the RTC provided, we understand that the Navy does not agree to add a task item for an Offshore FOSL or an alternative document that proposes specific measures to achieve and maintain appropriate offshore use restrictions to enable the Navy to complete the offshore environmental investigation and any necessary environmental remediation. No further response is necessary.

**DTSC Comments on the
Mare Island Draft Final Site Management Plan, dated 1/25/05**

1. We have no further comments at this time on the SMP text.
2. Task items should be added for the development of a FY06 SMP, starting with a draft in June 2005 and ending with a draft final in September 2005.
3. Based on our conference call on 2/15/05 to discuss the planned DRMO removal action, the task list for this work and the corresponding due dates should be revised per our discussion, to correspond to the overall timeline to have the removal action executed this season.
4. With respect to workload leveling, the draft final schedule translated into an unbalanced and excessive workload for the first quarter of calendar year 2005. Some of the proposed due dates have already been missed and extensions or new dates need to be established for these tasks. We have adjusted several document review due dates to address the workload imbalance. These change dates are listed below. At this time, we are planning our work based on the draft final SMP as modified by these comments and the below listed change dates. To facilitate any date changes from this list, we request that the Navy be prepared to propose alternative task items to delay to account for and offset any work to be accelerated.

	task ID	task name/description	DF SMP date comments due	change date comments due
1	3	IR17 path forward letter	1/31/05	3/15/05
2	5	IR17 RI DF report	3/14/05	3/31/05
3	21	D SEBS for northern sliver	3/15/05	7/31/05
4	22	DF SEBS for northern sliver	5/11/05	8/31/05
5	43	IA-A2 F RI report	3/1/05	4/30/05
6	44	IA-A2 add'l sampling summary report	3/1/05	4/30/05
7	78	perchlorate letter report	2/24/05	8/31/05
8	82	IA-F1 D RI report	4/8/05	8/31/05
9	84	IA-F1 DF RI report	7/8/05	FY06
10	111	IA-F2 RTC on D RI report	3/15/05	6/14/05
11	115	IA-F2 D FS & ARAR request	10/14/05	FY06
12	167	revised F offshore areas ERA	1/17/05	3/31/05
13	169	DF offshore data gaps TM	1/17/05	3/31/05
14	170	Offshore D CSM TM	4/11/05	9/30/05
15	172	D watershed contamination source doc	4/11/05	9/30/05
16	174	D offshore areas DQOs	5/9/05	9/30/05
17	196	D blg A155 SI report	2/15/05	6/30/05
18	198	DF blg A155 SI report	5/3/05	9/30/05
19	210	D greensand HHRA school site	1/31/05	3/31/05
20	211	D SI report school site	1/31/05	3/31/05