



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

April 28, 2005

Mr. Jerry Dunaway
Southwest Division,
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92101-8517

RE: Response to Comments on Draft Engineering Evaluation/Cost Analysis: Non-Time Critical Removal Action for the Fenced Scrapyard Area of the Defense Reutilization and Marketing Office Site, Mare Island, Vallejo, California, August 10, 2004 and the Draft Removal Action Workplan, Non-Time Critical Removal Action for the Fenced Scrapyard Area of the Defense Reutilization and Marketing Office Site, Former Mare Island Naval Shipyard, Vallejo, California, December 10, 2004

Dear Mr. Dunaway:

The following is our review of your responses to our comments on the draft Engineering Evaluation/Cost Analysis and Removal Action Workplan for the non-time critical removal action at the Defense Reutilization and Marketing Office (DRMO) scrap yard at Mare Island. We have also received your Draft Final Engineering Evaluation (EE/CA)/Interim Removal Action Plan (IRAP): Non-Time Critical Removal Action for the Fenced Scrapyard Area of the Defense Reutilization and Marketing Office Site (April 22, 2005) and our response incorporates our review of that document as well.

Response to EPA comments of January 20, 2005 on the Draft Engineering Evaluation/Cost Analysis:

General Comments:

1. EPA requested specific detail on investigations and findings to date on the DRMO site. Navy agreed to expand the discussion in section 2.2.

The response is adequate.

2. EPA commented that the EECA only presents alternatives that allow for industrial reuse. The development of alternatives discussion should also include a fifth option that would allow for unrestricted reuse, to give the public a full range of remedial options to comment upon. Navy agreed to develop a fifth alternative, as this proposed cleanup is intended to be a final remedy.

The response appears to be adequate.

We have an additional comment on the April 22, 2005 Draft Final version of the EE/CA. Your preferred alternative #4 specifies cleanup to industrial criteria, based upon assumed industrial reuse. Therefore, Alternative #4 also needs to specify that a deed restriction limiting the property to industrial use will be required. This appears to be implied in the text, but it needs to be specified in the decision documents as an integral part of the proposed remedy.

3. EPA commented that it appears that Navy is asserting that the northern portion of the site already meets the cleanup criteria for industrial use and is proposing to screen these soils for MEC items and reuse the material for back fill elsewhere in the yard. It is not clear from the information provided in the report that there is enough information to make the determination that all of this material is clean enough for re-use. Navy responded that because they intend to mechanically screen, analyze and characterize all excavated soil to determine their suitability for reuse as backfill or off-site disposal, the reference to the presumed suitability of site soils and associated Figure 11 will be removed from the report.

The response is adequate.

Specific Comments:

4. EPA requested that data for pesticides, PAHs and TPH which were also identified as contaminants of concern be graphically presented, as had been presented for PCBs, lead and iron. Data were presented showing where concentrations exceeded industrial criteria; EPA requested that data showing where concentrations exceed residential criteria also be graphically presented. Navy agreed to graphically present pesticide and PAH concentrations in soils and show where both residential and industrial criteria were exceeded. However, TPH would not be graphically presented as it only a chemical of potential concern at groundwater depth, and not expected to be encountered during soil excavation.

The response is adequate; Figures 9A and 9B of the April 22, 2005 Draft Final version address the comment.

3. EPA requested more specific detail on investigative findings on the IR 16 lead battery acid site associated with Building 715 in the center of the DRMO yard. Navy agreed to expand the discussion in section 2.2.

The response appears to be adequate, although it would be useful to include a figure showing previous excavations undertaken at the site in the final version for public comment.

2. EPA noted that Page 4 of Appendix B "Radiological Final Release Report" suggested that asbestos is a contaminant of concern at the DRMO scrap yard, but it did not appear to be discussed elsewhere in the EECA report. EPA requested that the potential asbestos hazard be evaluated. Navy responded that conversations with a former shipyard worker indicated that only

incidental quantities of asbestos had been encountered and no asbestos removal actions had been conducted at the site.

It is not possible to make a determination on the possible presence of asbestos at the DRMO site based upon the testimony and experience of one worker, given the duration that the DRMO yard was in use. Asbestos may be present at the site as small fibers that are not visible or identifiable except through microscopic analysis. EPA requests that the soils be sampled for asbestos prior to any excavation activity as it may affect selection of worker personal protective equipment as well as mechanical screening operations.

Response to EPA Comments of January 31, 2004 on the draft Removal Action Work Plan for the DRMO yard:

EPA submitted numerous comments on the Quality Assurance/Quality Control procedures outlined in the Work Plan. The Navy's responses are adequate to address EPA's concerns.

Thank you for the opportunity to review this report. If you have any questions, please call me at (415) 972-3150.

Sincerely,



Carolyn d'Almeida
Remedial Project Manager

cc: Gary Riley, RWQCB
Chip Gribble, DTSC
Henry Chui, DTSC