



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

N00221_001359
MARE ISLAND
SSIC NO. 5090.3.A

March 6, 2009

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: Response to Regulatory Agency Comments on the Draft Field Investigation Summary Report and Vapor Intrusion Risk Evaluation for the Installation Restoration Site 17 and Building 503 Area, Former Mare Island Naval Shipyard, Vallejo California, March 3, 2009

Dear Mr. Bloom:

Thank you for providing the responses to our previous comments on Vapor Intrusion Risk Assessment for IR 17. EPA greatly appreciates the effort and hard work the Navy has put in to address our concerns. We found the responses to our specific comments on the risk assessment generally satisfactory, with a few remaining exceptions:

General Comments

1. While Navy has diligently worked to quantify on-site risks for the IR 17 site, the primary concern EPA has raised with respect to vapor intrusion have been with the potential for off-site migration of vapors via storm drain lines and utility corridors. To date, there has been no comprehensive vapor intrusion investigation across Mare Island, and without a clear understanding of Island wide cumulative vapor intrusion risk it is not possible to ascertain at this time what level of risk reduction is appropriate at any single given site over the long term. In the absence of a comprehensive vapor intrusion investigation, EPA recommends that removal actions be conducted to achieve a default cleanup standard of 10⁻⁶ for vapor intrusion.
2. The Navy's response to EPA's comment #3 indicates the Navy believes that vapor intrusion risk at building 759 adjacent to the area of free product is "negligible". The response however does not appear to be sufficient to satisfy the requirements of AB 422 which " require that the exposure assessment of any health or ecological risk assessment prepared in conjunction with a response action taken or approved pursuant to the California Superfund Act include the development of reasonable maximum estimates of exposure to volatile organic compounds that may enter structures that are on the site or that are proposed to be constructed on the site and may cause exposure due to accumulation of those volatile organic compounds in the indoor air of those structures."

3. It appears that the Navy's long term strategy for addressing remaining risks at the site will rely heavily on institutional controls. However, as of yet, eight years following the initial early transfer, there is still no long term management program in place for the continued monitoring and oversight of institutional controls on Mare Island. Management of institutional controls will be particularly challenging with respect to soil vapor concerns, which do not readily respect property boundaries and deed restrictions.

Please feel free to contact me at (415) 972-3150 if you have any questions about this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carolyn d'Almeida".

Carolyn d'Almeida,
Remedial Project Manager

cc: Chip Gribble, DTSC
Paisha Jorgensen, RWQCB