



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

N00221_001568
MARE ISLAND
SSIC NO. 5090.3.A

August 17, 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: Draft Closure Approach Technical Memorandum for the J-line Section of Installation Restoration Site 14, Former Mare Island Naval Shipyard, Vallejo California; June 11, 2008

Dear Mr Bloom:

EPA has reviewed the draft technical memorandum for upcoming field investigation of the J Lines segment of the former industrial wastewater line at Mare Island. We offer the following comments:

General Comments:

1. Please identify on the figures the locations of previously identified pipeline breaks, cracks, connections and offsets that were identified during the video camera survey. These areas particularly need to be covered in the sampling program.
2. The sampling plan should be designed to characterize the nature and extent of abrasive blast material present along the pipeline corridor, and should include step-out borings to visually determine and record extent of abrasive blast material present.
3. Please include a summary evaluation of the existing soil and groundwater data. It is not clear why data was provided only on the CD version when there are only 7 pages of groundwater data with only 2 sample points for VOCs presented. The locations of these sampling points and their proximity to the J line segment are not noted on the figures. It appears that more groundwater and/or soil gas data should be collected to complete this investigation, particularly in the vicinity of identified pipeline breaks, cracks, connections and offsets where leakage could have occurred.

Specific Comments:

1. Section 3.4, page 5. The statement that ecological habitat is unlikely to develop because the area is zoned industrial and the City plans to construct a marina should be deleted. Under the current economic climate, the IR 04 area is just as likely to revert to habitat as to undergo development. An ecological risk assessment for this area should be considered.

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

Sincerely,


Carolyn d'Almeida
Remedial Project Manager

cc: Janet Naito, DTSC
Paisha Jorgensen, RWQCB

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