



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

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MARE ISLAND
SSIC NO. 5090.3.A

August 20, 2009

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 Engineering Evaluation/Cost Analysis (EECA) for Munitions Non-Time-Critical Removal Action Production Manufacturing Area and South Shore, Former Mare Island Naval Shipyard, Vallejo, CA, May 2009

Dear Mr Bloom:

EPA has reviewed the draft EECA for the munitions removal action and offer the following comments:

General Comments

1. The California Dept of Health Services, Toxic Substances Control Division's (DTSC's) Geological Services Branch has already submitted detailed comments which also delineate EPA's concerns. We agree with DTSC's comments that the rationale for distinguishing between "category A sectors", those areas considered most likely to contain Munitions and Explosives of Concern (MEC) and "category B sectors", those areas where probability of MEC is believed low, is not well explained or justified. It appears that the basis for "category A sector" determination was based more strongly on historical MEC finds rather than prior use of the property. We would like to see each of the areas outlined in detail in DTSCs comments addressed and the rationale for classification as "category A" or "category B" provided. The regulatory team should be involved in the prioritization of areas for investigation.
2. Figures 2-5 and Figures 2-6 indicate the anomalies identified for investigation during the prior surveys. Figures 2-9 and 2-10 indicate the proposed "category A" search boundaries juxtaposed with historical MEC finds. We are missing a figure which shows the currently identified anomalies juxtaposed with the proposed "sector A" and "sector B" search boundaries.
3. The proposed action is to investigate and remove 100% of identified anomalies in the "category A" sectors, while only 20% of the identified "category B" sector anomalies would be investigated. There should be contingency built into the plan to expand the survey to greater than 20% search in the event that MEC is discovered in areas that were thought to be unlikely to contain MEC.

4. The EECA contains references to the existence of explosives in soils in various locations throughout the study area, which do not appear to be addressed by this action.

5. EPA is still very concerned about the potential presence of MEC in the former dredge pond at River Park across the strait, and the Navy's abandonment of their responsibility for MEC on this parcel.

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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