



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

April 14, 2005

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

RE: Draft Preliminary Assessment/Site Inspection of the Paint Waste Area Investigation Area I Reuse Parcel XVI, Mare Island, Vallejo, CA, February 2005

Dear Mr. Dunaway:

EPA has reviewed your draft Preliminary Assessment/Site Inspection Report for the Paint Waste Area on Mare Island. We have the following comment:

1. Page 10, Potential Exposure Pathways, 2.2.1 Soil: Navy asserts that dermal contact is an incomplete and insignificant exposure pathway for birds and mammals, and proposes to remove this pathway from further evaluation. EPA disagrees that this pathway is insignificant or incomplete; dirt may easily become trapped within fur or feathers and work its way down to the skin, were dermal contact may have a longer duration for the animal than for a human. There may not be adequate research data to evaluate this exposure route at this time; but it should not be considered insignificant or incomplete. Rather, it should be addressed qualitatively, if not quantitatively.

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

Sincerely,

  
Carolyn Almeida  
Remedial Project Manager

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