



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

March 16, 2004

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

RE: Draft Sampling and Analysis Plan for Soil Gas Investigation at the Former Degreasing Plant, Investigation Area C2, Mare Island, Vallejo, California (February 20, 2004)

Dear Mr. Dunaway:

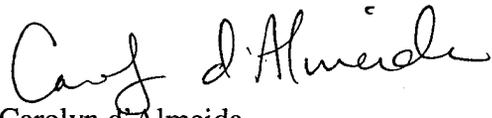
EPA has reviewed your Field Sampling Plan for soil gas sampling to locate source areas for the contamination found in storm drain manhole D1-C85. EPA agrees that the degreasing plant adjacent to building 742 is a likely source area for the VOC contamination, but may not be the only source area. In addition to helping reveal the source of the contamination, the use of a soil gas survey can help define the area of VOC contamination. Consequently, a sufficient area around the storm drain needs to be characterized. In addition, other tributary storm drain lines need to be investigated for possible sources of contamination.

The proposed sampling plan proposes to limit the investigation to the former degreasing plant as a source area, and the proposed sampling approach may not be adequate to bound the contamination. The plan as written proposes to utilize both a mobile lab and collect samples using Summa canisters for analysis by an offsite laboratory. Per your communication at the March 10, 2004 RPM meeting, Navy is no longer pursuing the use of a mobile lab. EPA supports using the mobile laboratory to better select sampling locations and to enable the Navy to more easily and more quickly define the boundaries of contamination.

EPA also concurs with DTSC's comment that this plan will only evaluate VOC contamination, and is not addressing the other contaminants, metals, PCBs and petroleum hydrocarbons that have been found in manhole D1-C85, which likely came from sources other than the former degreasing plant.

Thank you for the opportunity to review this report. If you have any questions, please call me at (415) 972-3150 or Emily Roth at (415) 972-3175.

Sincerely,

A handwritten signature in black ink that reads "Carolyn d'Almeida". The signature is written in a cursive style with a small accent mark over the 'i' in "Almeida".

Carolyn d'Almeida
Remedial Project Manager

cc: Emily Roth, EPA
Gary Riley, RWQCB
Chip Gribble, DTSC
Henry Chui, DTSC