

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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Mr. Stephen Chao
Naval Facilities Engineering Command
Western Division
900 Commodore Way, Bldg. 101
San Bruno, CA 94066-0720

September 17, 1992
File No. 2189.8009

Subject: Comments on Draft Final RI for OU2 and OU4

Dear Mr. Chao:

After speaking with Ms. Roberta Blank today, September 17, 1992, and learning that we are beginning the process of informal dispute resolution, I wanted to express my concern regarding the draft final documents.

My main concern is the way in which the contaminants of potential concern at site 3 are averaged during the risk assessment evaluation to develop a result of "no risk". The soil contamination in Marriage Road Ditch has the potential for impacting the standing water within the ditch, if not the subsurface groundwater zones. The methodology of the risk assessment utilized in the OU2 RI masks soil contamination at specific sites which may pose a substantial environmental threat. These sites include Site 3, Site 5 and Site 9. These areas, and potentially others, should be addressed as "hot spots" and be cited either within the RI document, or be addressed in the feasibility study for OU2.

If you have any questions, please call me at the Regional Water Quality Control Board at (510) 286-3980.

Sincerely,


Elizabeth J. Adams
Project Manager

cc: Roberta Blank, EPA Region IX
Mail Stop H-9-2

Cyrus Shabahari, DTSC