

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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

December 10, 1993
File No. 2189.8009

Subject: Comments on the Draft Proposed Plan for Operable Unit 2- East Soils

Dear Mr. Chao:

The San Francisco Bay Regional Water Quality Control Board staff have reviewed the proposed plan for the OU2-East soils and have the following comments.

1) The distinction between human receptors and ecological receptors needs to be clarified in the "Summary of Site Risks" portion of the proposed plan. The first paragraph in this section states that "the BRA evaluated chemicals of potential concern, exposure pathways, potential receptors and the risks of exposure...". It needs to be made clear that human receptors were evaluated for potential risks and not ecological receptors.

2) The proposed plan should include a statement that explains that a site-wide ecological risk assessment is being conducted, and that ecological receptors will be evaluated during that investigation.

3) In the second paragraph on page one and the fourth paragraph in the "Summary of Risks" section the Navy states that sites or chemical constituents do not pose a threat or unacceptable risk to human health or the environment. These statements are not completely accurate since human health was the only consideration for the risk calculations in the Remedial Investigation report and the use of the word "environment" implies a more complete evaluation of all potential risks. This distinction needs to be clearly stated in the proposed plan.

If you have any questions or concerns please call me at (510) 286-3980.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth J. Adams". The signature is written in a cursive style.

Elizabeth J. Adams
Project Manager

cc: Michael Gill, US EPA
C. Joseph Chou, DTSC