



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

August 16, 1995

Mr. Stephen Chao
Naval Facilities Engineering Command
Engineering Field Activity, West
900 Commodore Way, Bldg. 101
San Bruno, CA. 94066-2402

Re: Marked Up *Revised Final Operable Unit 6 Remedial Investigation Report*, dated July 20, 1995

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and associated response to comments (Cal/EPA Department of Toxic Substances Control [DTSC] comments). Unlike the past, it is refreshing to see non-confrontational responses to risk assessment questions. This is definitely a step forward.

The conclusion states that remediation is not necessary at OU6 to mitigate human health risks. However, the Navy wishes to wait for the Site Wide Ecological Assessment (SWEA) Phase II results before making a final decision regarding remediation at OU6. Human health risks were calculated based on both EPA and DTSC assumptions. There are cases in this risk assessment where the RME risk probability exceeds 10^{-4} when using DTSC assumptions (see Tables 6-62 and 6-63). All of these higher risks appear to be driven by dermal contact with soils containing Arochlor 1254, Arochlor 1260 and arsenic, typically in the Lindberg Ave. ditch and along the Northern Channel. We believe remediation is necessary at portions of OU6 because of these human health risks. However, remediation decisions should be made only after the SWEA is complete. The sentence regarding the "primary conclusion" in Section 7.4 should be removed.

The conclusion section of the document should also mention how the RI/FS process will proceed. At the scoping stage, the parties agreed that if risks were high enough to warrant remediation, a separate FS, ROD and Proposed Plan (PP) would be written for OU6. This is cited in the Federal Facilities Agreement. As discussed at the August 10, 1995 RPM meeting, because of incomplete SWEA Phase II data, we propose that it would be more cost effective and expeditious to include any necessary future OU6 work (FS, ROD, PP) as part of the Station-Wide documents. In addition, the highlighted changes in Chapters 6 and 7 of this draft version of the Final OU6 RI should be proofread for spelling errors. Call me at 415-744-2385 if you have any questions.

Sincerely,

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: M. Bessette (RWQCB), C. Joseph Chou (DTSC), K. Eichstaedt (URS),
S. Olliges (NASA), P. Strauss (MHB), M. Young (PRC) (Fax)

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