



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

April 23, 2007

Mr. Charles Perry, P.E.
Department of the Navy
BRAC Program Management Office West
1455 Frazee Rd., Suite 900
San Diego, CA 92108-4310

**Subject: Draft Proposed Plan for Remedial Action at Site 30, Daycare Center,
Naval Station Treasure Island**

Dear Mr. Perry:

EPA has reviewed the subject document. EPA Guidance *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents* (EPA 540-R-98-031) (*Guidance*) was referenced to conduct the review. Comments follow.

General Comment

1. After reading the Site 30 Draft Proposed Plan (PP) as a stand-alone document, the reviewer has no sense of the extent of contamination around the daycare center. Figure 3 shows building 502 and the area where debris was removed previously. Are the only areas of concern the area where debris was removed and the area over which the concrete pad was placed? Although there are several references that imply that contamination may be an issue below the building, the reader had no sense about what risk is associated with the soil surrounding the building. Is it high? Is there a playground where children play and may be exposed directly to dioxins? How contaminated is the site?

Specific Comments

1. INTRODUCTION, page 1. *Guidance* states that the *Introduction* should identify the Preferred Alternative for remedial action at the site and explain the reasons for its selection. Alternative 2 is not identified in the PP as the Preferred Alternative until page 7.
2. SUMMARY OF SITE RISKS, Ecological Risk, page 4. This section states that a "step-wise approach" was used to evaluate impacts to marine receptors. Please define

“step-wise approach” or explain the approach generally without using the specific term.

3. SUMMARY OF REMEDIAL ALTERNATIVES, page 4. The Preferred Alternative is not identified at the beginning of this section, contrary to *Guidance*. The reader would benefit from knowing the identity of the Preferred Alternative before reading the descriptions of alternatives.
4. SUMMARY OF REMEDIAL ALTERNATIVES, Description of Alternative 2, page 5. The first paragraph of this section states that institutional controls “can limit changes to site conditions that may alter exposure mechanisms.” What kind of changes would affect human exposure to contamination? Would the exposure “mechanism” change or would the risk change? Please express this idea clearly, keeping the target audience in mind.
5. SUMMARY OF REMEDIAL ALTERNATIVES, Description of Alternative 2, page 5. Please consider revising the first sentence of the second paragraph. As written, the sentence states that there are no unacceptable risks for the use of the site as a daycare center. However, if the proper interpretation of the sentence is that there are no unacceptable risks to **human health** associated with the contamination at the daycare center, the intended meaning is not being expressed.
6. EVALUATION OF ALTERNATIVES, Overall Protection of Human Health and the Environment, page 5. The last paragraph on page 5 states that Alternative 2 ensures that human exposure pathways remain incomplete. Please define “complete” and “incomplete” pathways, either as part of the exposure pathways definition or elsewhere in the document, if the terms must be used.

Please contact me with any questions related to this review at (415) 972-3112.

Sincerely,



Christine Katin
Remedial Project Manager

cc: Ms. Agnes Farres, RWQCB
Mr. Henry Wong, DTSC

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