



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
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April 20, 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 31, Former South Storage Yard, Naval Station Treasure Island**

Dear Mr. Perry:

EPA has reviewed the Site 31 Draft Proposed Plan. EPA Guidance *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents* (EPA 540-R-98-031, July 1999) (*Guidance*) was referenced during the review to ensure that the Proposed Plan will be effective in facilitating public involvement in the remedy selection process. The following comments apply to the subject document:

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 5 is not identified in the Draft Proposed Plan as the Preferred Alternative until page 8.
2. Site Background, page 2. The second paragraph of this section states that the land at Site 31 was used as a storage yard, but that the nature of operations is unknown. Please explain.
3. Summary of Site Risks, Human Health Risk Assessment, page 4. In general, the fourth paragraph could be improved to avoid misunderstanding. Modeling is used to predict the receptors' blood-lead levels rather than evaluate their *actual* blood-lead levels. Please consider revising this paragraph to communicate the information clearly and accurately to the target audience.
4. Summary of Site Risks, Human Health Risk Assessment, page 4. The fourth paragraph on this page states that "The modeling results exceeded the targeted level of concern for the child resident." This is confusing. Did modeling show that the risk to children was unacceptable? Please consider revising the wording for clarity.

5. Remedial Action Objectives, page 5. The statement that “exposure pathways for ecological receptors are incomplete” may not be understood by the target audience.
6. Summary of Remedial Alternatives, page 6. The Preferred Alternative is not identified at the beginning of this section, contrary to *Guidance*.
7. Summary of Remedial Alternatives, Alternative 5, page 6. The statement that a depth was “conservatively selected to allow for over-excavation in areas of known contamination” may not be understood by the target audience. Does “conservative” mean “health protective” in this statement? Does “over-excavation” mean more excavation than is necessary to remove the contamination? Please revise to suit the target audience.
8. Summary of Remedial Alternatives, Alternative 5, page 6. The description of Alternative 5, the Preferred Alternative, states that “Construction of a new or replacement schoolyard ... [is] not included in this alternative,” yet the section on the HHRA states that the “existing and planned future use of the site is as an elementary schoolyard.” Does this simply indicate that the costs associated with Alternative 5 do not include reconstruction or does the possibility exist that the use of Site 31 will no longer be as an elementary schoolyard? Please clarify.

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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