

## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION  
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464-1255March 6, 1985  
File No. 2129.2011B(LWT)

Mr. Alex Dong  
Acting Head, Environmental Operations Section  
Department of the Navy  
Western Division  
Naval Facilities Engineering Command  
P.O. Box 727  
San Bruno, CA 94066

Dear Mr. Dong:

Subject: Comments regarding Verification Study Work Plan  
for Mare Island Naval Shipyard, dated November 1984

We are in receipt of the Verification Study Work Plan for Mare Island Naval Shipyard that was transmitted to us on February 12, 1985. The work plan is generally adequate with respect to the number and locations of soil samples and groundwater monitoring wells for this phase of the confirmation study. Our site specific comments are as follows:

1) Site 1

Since pairs of deep and shallow wells have recently been constructed for use in groundwater monitoring under ISD, it would be useful to also construct these wells in deep and shallow pairs, so that in the future, if the Navy wishes to incorporate these wells into their hazardous waste facility monitoring program, the proposed wells would be at par with many of the other wells already on site in the program.

2) Site 5

The permeants for the leachability tests should include solutions which better simulate the actual conditions at the site such as riverwater and rain water (dilute acidic solution). In addition to the leachability tests, a waste extraction test should be performed on the spent abrasives.

3) Site 12

During our brief inspection of the site, brass casings were noticed on the ground. No doubt, there would also be lead from the ammunition disposed of here. So at a minimum, copper, zinc, and lead should be included in the analyses, if not an entire metals scan.

4) Site 14

This site, together with the landfill, is handled as a single hazardous waste management unit under the RCRA program. It would be useful if the two proposed wells for this site were constructed in deep and shallow pairs so that they maybe incorporated into the RCRA program in the future to monitor the local situation around the ponds.

The procedures and methods of sampling and drilling seem generally adequate. However, some specifics were left out, such as: method of cleaning of the sampling and drilling instruments and equipment, and method of disposal of the drill cuttings. In addition, it should be specified that teflon caps be used for soil samples instead of tinfoil and plastic caps as it will better contain any volatile compounds in the sample.

Finally, the commonly accepted analytical procedure for metals analysis is by absorption spectroscopy. Metals analysis by arc source emission spectroscopy may not achieve low enough detection limits for the purposes of this study.

Please submit a brief progress report on the verification study by June 15, 1985. If at anytime during this study, contamination is detected, we should be notified as soon as possible. The projected schedule with study completion within seven months is satisfactory. We will expect submittal of the final verification study report to this office by October 15, 1985. If the report is not completed by this date, please submit a status report in its place with a revised schedule for completion. We look forward to working with the Navy on the next phase of the confirmation study after the completion of this verification phase.

If you have any questions, please call Lila Tang at (415)464-0990.

Sincerely,



Harold Singer  
Chief, Industrial Division

cc: Ed Refsell, DOHS  
EPA, Toxics and Waste Management Division