



Alan C. Lloyd
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721

N00221_000706
MARE ISLAND
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

February 7, 2005

Mr. Dwight Gemar
Weston Solutions, Inc.
750 Dump Road
Mare Island
Vallejo, California 94592

Dear Mr. Gemar:

Mare Island Draft Feasibility Study, Investigation Area H1, dated November, 2004

The Department of Toxic Substances Control has conducted a partial review of the subject document. The attached comments are forwarded to you for your consideration. DTSC anticipates having additional comments on the subject document, following resolution of issues related to the corresponding draft final Remedial Investigation report and the completion of the final Remedial Investigation report.

Should you have any questions regarding this letter, please call me at (510) 540-3773.

Sincerely,

Chip Gribble
Remedial Project Manager
Base Closure Unit
Office of Military Facilities

Attachments

cc: Mr. Jerry Dunaway
Mr. Gary Riley
Ms. Carolyn d'Almeida
Mr. John Lucy

Post-Net™ brand fax transmittal memo 7671		# of pages ▶ 7	
To	Jerry Dunaway	From	Chip Gribble
Co.	Naval Southwest	Co.	DTSC
Dept.		Phone #	510-540-3773
Fax #	619-532-0940	Fax #	

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**DTSC Comments on the Mare Island
Draft Feasibility Study, Investigation Area H1,
dated November 2004**

1. Page xi, para. 1: This draft Feasibility Study will need to be rewritten for consistency with the eventual final Remedial Investigation Report. Our ability to review this draft FS is limited due to significant outstanding issues in the current draft final RI report. Additional comments on the FS should be forthcoming, following a review of a final RI report.
2. Page xv: Assessing community acceptance may be challenging insofar as the immediate affected community on Mare Island is expected to change significantly over the next few years.
3. Page 4-2, section 4.1.2.1: In the absence of a compelling argument and a rational basis to support the alternative of a non-uniform cap across the entire containment area, a uniform RCRA cap across the entire containment area should be presented as Alternative 2.
4. Page 4-3, section 4.1.2.2: A perimeter fence and signage around the containment area is currently under discussion and may be required. As we have indicated previously, the COV Final Reuse Plan designation of open space/recreational use for this area may not be attainable.
5. Appendix A, page 1-1, last bullet: 750 mg/kg for lead was used, not as a final cleanup goal, but as an Interim Remedial Action Plan goal. This concentration was identified as likely to be consistent with a reasonably anticipated final remedy, but not guaranteed. Additional excavation may be required, subject to an eventual final remedy.



Department of Toxic Substances Control



Alan C. Lloyd, Ph.D.
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Cal/EPA

8800 Cal Center Drive
Sacramento, California 95826-3200

Arnold Schwarzenegger
Governor

MEMORANDUM

TO: Chip Gribble
Remedial Project Manager
Office of Military Facilities
Site Mitigation & Brownsfields Reuse Program

FROM: Scott Ward
Hazardous Substances Engineer
Closure and Post-Closure Section
Northern California Permitting and Corrective Action Branch

DATE: January 31, 2005

SUBJECT: Review of Draft Feasibility Study, Investigation Area H-1, Mare Island, Vallejo, CA, November 2004.

Introduction

As you requested I have reviewed the following document:

Draft Feasibility Study, Investigation Area H-1, Mare Island, Vallejo, CA (Weston, Nov 2004).

Comments

1. Figure 4-1 Containment Area Alternative 2. The legend stating the RCRA / Non-RCRA cap area appears reversed.
2. 4.1.2.2, Land Use and Access Restrictions. The resolution of issues relating to the land use and access restrictions to the containment area is ongoing. DTSC will comment further as the details of the final cap design and access restrictions are resolved.
3. 3.4.1.2, Treatment; 4.1.2.3, Groundwater Containment, 2nd paragraph; and 5.1.2.2, Compliance with ARARs, 4th paragraph. These paragraphs state that groundwater collected in the extraction trench will be discharged to the Vallejo

POTW. This groundwater is also considered leachate from the RCRA landfill unit which contains listed hazardous waste. The regulatory issues relating to this discharge are currently being investigated. DTSC will comment further as the resolution of these issues is complete.

4. Table 3-1, 3-2, and 3-3. Please show units in these tables.
5. Appendix C, 3.2, Future Exposure Scenario, 4th sentence. The numerical information in this sentence appears to contain a typographical error.



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Agency Secretary
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Department of Toxic Substances Control

700 Heinz Avenue, Suite 200
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Arnold Schwarzenegger
Governor

MEMORANDUM

TO: Chip Gribble
Site Mitigation
Northern California Region
Berkeley

VIA: John Hart, P.E. *[Signature]*
Chief, Engineering Services Unit

FROM: Ram Ramanujam, P.E. *[Signature]*
Hazardous Substances Engineer
Engineering Services Unit

DATE: January 31, 2005

SUBJECT: Draft - Feasibility Study - Investigation Area H1 - Mare Island,
Vallejo, CA



Per your request, I have reviewed the following document:

Draft - Feasibility Study - Investigation Area H1, Mare Island, Vallejo, CA
(prepared by Weston Solutions, Inc. November, 2004).

Based on the review, my comments are as follows:

COMMENTS:

1. Executive Summary: Feasibility Study discusses remedial alternatives for three areas within Investigation Area H1 (IA H1): 1. The Landfill Area inside the existing groundwater Containment Barrier, 2. The Upland areas outside the Containment Barrier, and 3. The Non-Tidal Wetland Areas outside the Containment Barrier. All these three areas should be identified (or referenced) in a map in the Executive Summary.

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2. Section 4.1.2.1.2, Non-RCRA Cap: The Report proposes a Non-RCRA cap in certain parts within the containment area. It is Department of Toxic Substances Control's (DTSC) understanding that hazardous waste exists within the containment area. Based on this fact, the entire area is contained with the installation of a slurry wall. The cover should follow a RCRA cover design (multi-layer cap with **composite** barrier layer). Please refer to the Environmental Protection Agency (EPA) Guidance document:

Seminar Publication - Design and Construction of RCRA/CERCLA Final Covers. EPA/625/4-91/025, May 1991.

3. Section 4.2.2.2, Hot Spot Excavation: The Report should include discuss how 'hot spot waste excavation materials' will be remediated. Also, the Report should define the term, 'hot spot.'

4. Section 4.2.2.4, 2-Foot Soil Cover: The Report should include the following:

- . Rationale and justification for the 2-foot soil cover,
- . Criteria for the engineering properties of soil such as Unified Soil Classification of Soil (USCS), Hydraulic Conductivity etc.

5. Section 4.2.2.5, Wetland Mitigation: It is DTSC's understanding that there are many outstanding issues on Wetland mitigation (and it has not been finalized). DTSC will comment on Wetland mitigation when it is finalized.

6. Section 4.2.2.6, Green Sand Excavation in Northwest Dump Road Subarea: The Report should identify where the excavated green sand will be disposed.

7. Sections 4.2.3.2, 4.2.4.3, and 4.3.2.2: Hot Spot Excavation: Please see Comment No: 3.

8. Section 4.3.3.2, Wetland Excavation: Please see Comment No: 5.

9. Section 5.1.2.2, Compliance With ARARs: The Report should include references to the requirements of Title 22, Section 66264.310, Closure and Postclosure Care.

10. Section 5.2.2: Please see Comment No: 4.

11. Table 2-9, Potential State Action - Specific ARARs: Please include appropriate requirements of Title 22 (such as Section 66264.310).

APPENDIX A

12. Introduction:

. Please include a location map of the Installation Restoration (IR) Site 16 Subareas B3 and B5 with the Appendix A.

. "WESTON prepared an Engineering Evaluation/Cost Analysis for a non-critical removal action for IR 16 Subareas B3 and B5." It is our understanding that this work was done pursuant to the interim RAP for the slurry wall/extraction trench. Please revise accordingly.

. Table A-1, Installation Restoration Site 16 Subareas B3/B5 - Confirmation Sampling Results: The agencies agreed to an Interim RAP cleanup goal of 750 mg/kg for lead at the Site IR16 subareas B3 and B5. However, the confirmation sampling results show the cleanup of lead to 750 mg/kg has not been achieved. To cite a few samples, please refer to confirmation sample results L16 (3400mg/kg), L5(8300mg/kg), L6(9500mg/kg), L7(3600mg/kg) etc. It is not clear how these areas were judged to receive the clean backfill materials. DTSC would like to review the Construction Quality Assurance (CQA) procedures for the removal of lead contaminated soil from Site IR 16 Subareas B3 and B5.

I will be available to attend any project meeting to resolve the technical issues identified in this memorandum. In the meantime, if you need any clarification on this memorandum, please contact me at (916) 255-6662.