



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



Department of Toxic Substances Control

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MARE ISLAND
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

January 26, 2006

Mr. Jerry Dunaway
Base Closure Manager
BRAC Program Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310

Dear Mr. Dunaway:

**DRAFT FINAL CONCEPTUAL SITE MODEL AND GEOPHYSICAL INVESTIGATION
WORK PLAN SOUTH SHORE AREA AND PRODUCTIN MANUFACTURING AREA,
FORMER MARE ISLAND SHIPYARD, SOLANO COUNTY**

Thank you for providing the Department of Toxic Substances Control (DTSC) the opportunity to review the *"Draft Final Conceptual Site Model and Geophysical Investigation Work Plan (Work Plan) South Shore Area and Production Manufacturing Area, Former Mare Island Naval Shipyard (MINS)"* dated September 2005. The Work Plan was prepared by Weston Solutions, Inc. on behalf of the South West Division, Naval Facilities Engineering Command. Our comments on the subject document are provided below.

If you have questions regarding these comments/recommendations, please feel free to contact me at (916) 255-3610 or via email at RGhazi@dtsc.ca.gov.

Sincerely,

Rizgar A. Ghazi, P.E.
Project Manager
Office of Military Facilities

Attachment:

cc: See next page

Mr. Jerry Dunaway
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Page 2

cc: Mr. Dwight Gemar
Weston Solutions, Inc.
1575 Treat Boulevard., Suite 212
Walnut Creek, California 94598

Ms. Carolyn d'Almeida
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Mr. George Leyva, EG
San Francisco Bay Region
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Oakland, California 94612

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DTSC RESPONSE TO NAVY RESPONSE TO COMMENTS

January 24, 2006

<p>General Comment #1</p>	<p><u>DTSC Comment:</u> Licensed Geophysicist: The Work Plan and the Geophysical Prove-out must be signed a California licensed geophysicist.</p> <p><u>Navy Response:</u> Comment acknowledged; the next revision of the document will be signed by a California licensed geophysicist.</p> <p><u>DTSC RTC:</u> Response is adequate.</p>
<p>General Comment #2</p>	<p><u>DTSC Comment:</u> Land Use Controls: Following the completion of munitions response actions, it is possible that some Munitions and explosives of concern (MEC) items may remain on the South Shore Area (SSA) and Production Manufacturing Area (PMA) parcels. MEC items may still be found within the cleared areas (due to detection capabilities of instruments) and/or areas below the depth of detection of the instruments. DTSC cannot certify that all MEC has been cleared and thus will be requiring a land use covenant.</p> <p><u>Navy Response:</u> A determination of future land use controls will be made after a thorough evaluation of both the geophysical survey and intrusive investigations results.</p> <p><u>DTSC RTC:</u> Response is adequate.</p>
<p>General Comment #3</p>	<p><u>DTSC Comment:</u> Hazardous, Toxic, and Radioactive Waste (HTRW): This Work Plan Does not address HTRW related remediation of the SSA and PMA that may be required. Any additional activities for the SSA and PMA must be identified before the parcels are transferred.</p> <p><u>Navy Response:</u> The remediation of HTRW is not within the scope of the current project and therefore was not included in the work plan. However, it will be addressed by the Navy as a separate issue.</p> <p><u>DTSC RTC:</u> Response is adequate.</p>
<p>Specific Comment #1</p>	<p><u>DTSC Comment:</u> Section 5.2.1, Data Sources, Page 5-4: The text states the digital geophysical mapping (DGM) will be integrated into the graphical information system (GIS) database. DTSC requests that the DGM information be provided for review.</p> <p><u>Navy Response:</u> Survey data will be available to DTSC for review.</p> <p><u>DTSC RTC:</u> Response is adequate.</p>

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<p>Specific Comment #2</p>	<p><u>DTSC Comment:</u> Section 5.4.1, Geophysical Investigation Process, Page 5-6: The text states that a DGM survey is planned for three buildings that are constructed above grade on pilings with an accessible crawl space. However, the Work Plan does not identify if any other buildings with above grade construction or on grade construction will be investigated. The Work Plan should identify all buildings within the PMA/SSA including historical (existing/non-existing), construction type, location of buildings, subsurface material (fill/native soils), year of construction, year of demolishing, and purpose of building (include all activities). The work Plan should discuss the type of investigation that will be conducted for each building, if any.</p> <p><u>Navy Response:</u> Although the current contract includes the survey of only three buildings, the Navy has indicated that all accessible building footprints may be surveyed at a later date.</p> <p><u>DTSC RTC:</u> Response is Inadequate. DTSC understands that investigation of the remaining buildings may not be conducted at this time. However, information regarding the building as requested in our original comments should be provided.</p>
<p>Specific Comment #3</p>	<p><u>DTSC Comment:</u> Section 5.4.2.1, Instrumentation – GeoVizor System, Page 5-9: The GeoVizor System magnetometer is proposed for use in surveying areas underneath buildings. This system is a new technology and has not been previously vetted out in the industry. DTSC recommends the system be thoroughly tested out during the prove-out portion of the investigation. All anomalies detected should be investigated including the use of seeding to test out the instrument capabilities.</p> <p><u>Navy Response:</u> The GeoVizor system will be carefully evaluated through the use of blind seeds during the Geophysical Prove-Out survey to determine detection capabilities. Sufficient seed items (a minimum of one per building) will be also be placed in GeoVizor survey areas to demonstrate the ability of the system to reliably locate anomalies.</p> <p><u>DTSC RTC:</u> Response is adequate.</p>