California Regional Water Quality Control Board
San Francisco Bay Region

Alan C. Lloyd, Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

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MARE ISLAND
SSIC NO. 5090.3.A

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File No. 2129.2011(GVL)

Mare Island NSY and NTC San Diego
BRAC Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310
Attn: Mr. Jerry Dunaway, BRAC Environmental Coordinator
jerry.dunaway@navy.mil

SUBJECT: Comments on Technical Report - Feasibility Study, Installation Restoration Site 17, Bldg 503 Area, Investigation Area A1, Mare Island, Vallejo, California

Dear Mr. Dunaway:

We reviewed the *Feasibility Study, Installation Restoration Site 17, Bldg 503 Area, Investigation Area A1, Mare Island, Vallejo, California,* dated June 25, 2004. The report describes six remedial alternatives for cleanup of the contamination at the site and is based on site information presented in the technical report *Remedial Investigation for Installation Restoration Site 17, Bldg 503 Inv. Area A1,* dated August 26, 2003. Alternative 5 is a satisfactory remedial action, which involves soil excavation, off-site disposal, backfilling with clean soil and implementation of institutional controls.

The remedy should at a minimum, comply with State Board Resolution No. 92-49 which requires that contaminant sources be removed to the maximum extent practicable, and if residual contamination persists after remediation, groundwater monitoring is required to verify that natural attenuation is occurring and that the pollutants are not migrating. In addition, a soil gas study should be implemented at undisturbed areas to verify the suitability of the site for its final land use.

The monitoring program should adequately monitor the site for all chemicals of concern. Wells should be properly placed, surveyed for elevation to the nearest 100^{th} of a foot and properly screened across the contaminated zone(s). The analyses for hydrocarbons should include a chromatogram to determine if unreported contaminants exist. If groundwater contamination exceeds the ESLs, or the site's screening criteria, monitoring will be required for a minimum of four consecutive quarters. If groundwater contamination cannot be shown to be receding by naturally occurring processes, additional remedial actions may be needed.

We can consider the case for closure or "No Further Action", if the pollutant concentrations in the groundwater are receding by naturally occurring processes and will likely continue to do so. Any

request for closure should include an estimate for the time needed to eventually achieve water quality objectives.

If you have any questions or require further information, please contact me at (510) 622-2462 [e-mail gleyva@waterboards.ca.gov].

Sincerely,

George Leyva, Eng. Geologist
Project Manager

cc:

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