



Linda S. Adams
Secretary for
Environmental Protection

California Regional Water Quality Control Board

San Francisco Bay Region

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.waterboards.ca.gov/sanfranciscobay>



Arnold Schwarzenegger
Governor

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MARE ISLAND
SSIC NO. 5090.3.A

Date: **MAR 08 2007**
File No. 2129.2001 (LCR)

Mr. Michael Bloom
Department of the Navy
BRAC Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

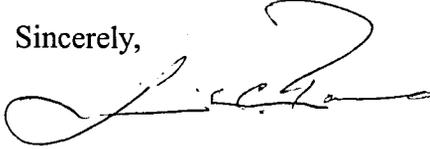
SUBJECT: Draft Data Quality Objectives to Support the Baseline Ecological Risk Assessment and Outfall Sediment at Investigation Area K, dated April 20 2006. Mare Island, Vallejo, California

Dear Mr. Bloom:

San Francisco Water Board Staff have reviewed the subject document and provide the comments listed below. Additionally, we concur with previous comments submitted by DTSC, DFG, and EPA.

1. The Water Board supports the choice of the San Pablo Bay Island No. 1 as a sediment reference site for this 1A-K sediment sampling assessment (Table 1, Identify the Decisions, Bioaccumulation Assessment, number 7 and Table 1, Step 5 Develop Decision Rules, number 7). Staff recommends, however, that sampling be conducted in non-winter months when unexplained toxicity has not been observed.
2. While we support a sampling bias toward stormwater outfall areas, it is unclear why a full site characterization and remedial investigation for the entire Navy offshore parcel 1A-K is not being conducted to assess possible contamination from the Mare Island site beyond outfalls. Because of the history of activities affecting the site (i.e. offshore dumping of munitions), and the undefined factors that influence the dispersion of sediment in the area (i.e., tides and currents, erosion, dredge activities, and harbor use), a full sediment characterization of a wider area would increase confidence in the apparent hypothesis that contamination is localized around outfalls.
3. If the Navy has conducted tracer studies from outfalls to elucidate tidal and current dynamics, the information would assist us in understanding their influence on sediment deposition and contaminant transport.
4. Please delineate the Navy's offshore property boundary in Figure 1 and all other similar figures.

5. As the report is written, it is difficult to link the problem assumptions (i.e. Table 5) with the sampling densities and locations chosen throughout the assessment (sampling densities chosen on Pg. 28, Table 7, column 5, and figures 2 through 4). Please clarify. The sampling densities presented appear insufficient to provide a full profile of possible contamination. We support the DTSC assertion (#11, 2/6/2007 comment letter) that sampling densities should be increased. We also support the need for a follow-up meeting with current agency staff to clarify assumptions and discuss the adequacy of sampling location, depth, and number.
6. Page 28, Table 7, column 7: Please clarify the criteria by which "Professional judgment will be used to select specific samples that will be sent to the analytical laboratory for confirmation using conventional methods."
7. We support the DTSC's assertion (comment #8, 2/13/2007) regarding the need to assess human health risk for a scenario where deeper sediments may be exposed in the future.

Sincerely,


Linda C. Rao
Remedial Project Manager

cc:

Chip Gribble (DTSC-Berkeley, CA)

Becky Stanton (CDFG/OSPR- Sacramento, CA)

Ms. Carolyn d'Almeida (US Environmental Protection Agency)
413 Poppyfield Dr.
American Canyon, CA 94503

