



California Regional Water Quality Control Board

San Francisco Bay Region

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Arnold Schwarzenegger
Governor

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MARE ISLAND
SSIC NO. 5090.3.A

Linda S. Adams
Secretary for
Environmental Protection

Date: **JUN 19 2007**
File No. 2129.2001 (BJT; LCR)

Michael Bloom
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SUBJECT: Comments on the *Draft Action Memorandum Interim Remedial Action Plan CERCLA Time Critical Removal Action, Installation Restoration Site 04, Parcel XVI Paint Waste Area, Horse Stables Area, and Installation Restoration Site 05*, dated May 30, 2007, Former Mare Island Naval Shipyard, Vallejo, California

We have reviewed the subject document and do not have comments beyond what has been discussed in: (1) our May 31, 2007 letter, which provided comments on the May 14, 2007 Time Critical Removal Action (TCRA) Work Plan; (2) our meetings, teleconference calls, and site visits for the TCRA; and comments provided by the Department of Toxic Substances Control in letters dated May 25 and June 8, 2007. We remain concerned about the TCRA plan for excavation at Installation Restoration Site 4 (IR04). Text pits excavated at IR04 on June 12 and 13, 2007 encountered loose, unconsolidated, saturated sand a few feet below the ground surface. We observed flowing sand during attempts to excavate this sand, and we question plans to slope sidewalls of the IR04 excavations. Other approaches to excavation should be considered to achieve removal of the abrasive blast material to the maximum extent practical.

Please contact either of the undersigned at 510 622-2300 if you have any questions.

Sincerely,

Brian J. Thompson, CHG, CEG
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Linda C. Rao
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