



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

N00221_001172
MARE ISLAND
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

February 7, 2008

Mr. Michael Bloom
Department of the Navy
Base Realignment and Closure
Program Management Office
1455 Frazee Road, Suite 900
San Diego, California 92108-4301

COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN ADDENDUM 01, ADDITIONAL SAMPLING INVESTIGATION AREA F1, DATED DECEMBER 2007

Dear Mr. Bloom:

The type and scope of the work described in the subject plan is acceptable as a discrete activity. We continue to be concerned that the characterization of the basic nature, extent, and source areas of volatile organic compounds (VOCs) at the F1 investigation area is incomplete. We are encouraged by the cooperation from the U.S. Navy to continue discuss the outstanding issues associated with the completeness of remedial investigation for this area. We believe that additional soil and groundwater characterization of the nature and extent of VOCs is appropriate and is a critical foundation for the evaluation of natural attenuation and human and ecological risks.

Enclosed are additional comments on the subject document. If you have any questions or wish to discuss any issues further please contact me at (916)255-3738 or by Email at bkilgore@dtsc.ca.gov.

Sincerely,

William Kilgore, P.E.
Senior Hazardous Substances Engineer
Office of Military Facilities

Enclosure

cc: See next page.

Mr. Michael Bloom
February 7, 2008
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cc: Mr. Dennis Kelly
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Mr. Buck King
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Mr. Charles Gribble
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700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721

MEMORANDUM

TO: Chip Gribble and Bill Kilgore
Engineering Geologists
Office of Military Facilities, Site Mitigation

FROM: Buck King, PG, CHG *Buck King*
Engineering Geologist, Geological Services Unit (GSU)
Hazardous Waste Management Program, Berkeley Regional Office

CONCUR: Brian Lewis, CHG, CEG *BK for*
Senior Engineering Geologist, GSU
Hazardous Waste Management Program, Sacramento Regional Office

DATE: January 29, 2008

SUBJECT: AREA F1 ADDITIONAL SAMPLING AND ANALYSIS PLAN GSU
MARE ISLAND, VALLEJO, CALIFORNIA
PCA: 18040 SITE: 201208-18 GSU: 720119

DOCUMENTS REVIEWED

Draft Sampling and Analysis Plan Addendum 01 (Field Sampling Plan / Quality Assurance Project Plan) Additional Sampling and Investigation Area F1, Mare Island Vallejo, California (Area F1 SAP Addendum) dated December, 2007. Report prepared by SulTech.

INTRODUCTION

As you requested, the GSU of the Department of Toxic Substances Control (DTSC) reviewed the Area F1 SAP. This memorandum provides discussion and recommendations of the report review. If you have questions, please contact Buck King at (510) 540-3955 or Brian Lewis at (916) 255-6532.

DISCUSSION

The Area F1 SAP Addendum is an addendum to a previously prepared "Revised Draft Final Sampling and Analysis Plan, Additional Sampling Investigation Area F1, Mare Island, Vallejo, California" dated June 2003. The Area F1 SAP Addendum describes the proposed sampling and analysis of nine existing groundwater monitoring wells (A215W01, A215W02, A216W02, A216W03, A216W04, A267W02, A267W03, A267W04, and A267W05) located in Area F1. Groundwater samples are being collected for the analysis of volatile organic compounds (VOCs) by US Environmental Protection Agency (EPA) Method 8260B, total petroleum hydrocarbons (TPH)-extractable and TPH-purgeable by EPA Method 8015B, dissolved organic gasses (methane, ethane, and ethene) by Robert S Kerr (RSK) methodology, anions (chloride and sulfate) by EPA Method 300.0, nitrate by Methods for Chemical Analysis of Water and Wastes 353.2/353.3, sulfide by EPA Methods 376.1/376.2, and alkalinity, iron(II), manganese (II) using Hach field test kits 8203/8146/8149.

Groundwater samples from the nine existing wells are being collected and analyzed to evaluate existing conditions and to provide results that can be compared to previously collected data to evaluate biodegradation. The VOCs, dissolved gasses, and inorganic analytes (chloride, sulfate, nitrate, sulfide, alkalinity, iron, and manganese) will be used with the BIOCHLOR model to evaluate if biodegradation is occurring and attempt to validate the site model. BIOCLOR model validation will be attempted by comparing proposed sampling analytical results to predicted chemical results previously presented in *Draft Remedial Investigation Report Installation Restoration Program Sites within Investigation Area F1* dated February 2005. The nine existing wells were last sampled in the summer of 2003 at which time all wells had detectible concentrations of chlorinated solvents.

The Area F1 SAP Addendum indicates that only one round of groundwater well sampling and analysis is proposed. The Area F1 SAP Addendum does indicate that additional rounds of sampling may be conducted as necessary to achieve project objectives.

RECOMMENDATIONS

The GSU recommends that the proposed groundwater sampling and analysis described in Area F1 SAP Addendum be implemented. The results of the proposed sampling and analysis should be used for site characterization and further evaluation of site biodegradation activity of recognized groundwater contamination.