



California Regional Water Quality Control Board

San Francisco Bay Region



Terry Tamminen
Secretary for
Environmental
Protection

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Arnold Schwarzenegger
Governor

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MARE ISLAND
SSIC NO. 5090.3.A

Date: **OCT 05 2004**
File No. 2129.2011 (GJR)

Commander
Attn: Mr. Jerry Dunaway (Code 06CM.JD)
Southwest Division, Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

SUBJECT: Staff Comments on Draft Site Management Plan, Former Mare Island Naval Shipyard, Vallejo, California (August 4, 2004)

Dear Mr. Dunaway:

Water Board staff have reviewed the above-referenced document and submit the following comments:

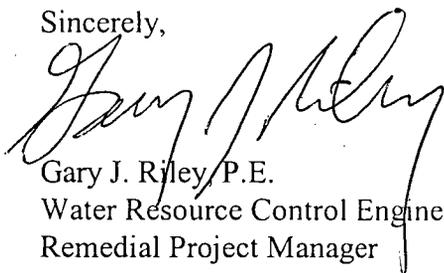
1. The draft Site Management Plan (SMP) does not include proposed dates for most submittals. Staff requests an amended draft SMP that includes proposed deadlines for the Navy submittals in the forthcoming year. It is difficult to estimate resource needs for Water Board staff in the absence of a detailed schedule showing all planned documents and dates.
2. The Executive Officer, on behalf of Cal-EPA, submitted a request to the Navy on June 16, 2003, for a base-wide Emergent Chemicals Source Evaluation Report to examine the potential presence of a number of emergent chemicals, including perchlorate, at Mare Island. This report has not been received. This item should be added to the basewide schedule with a proposed submittal date.
3. Closure of UST A71-W was approved by the Executive Officer on December 11, 2003. This item is complete and should be removed from the backlogged documents list.
4. The Water Board will not submit comments on the following backlogged documents. Please revise the list of backlogged documents to state "NA" in the "RWQCB" column.
 - a. PCB Report for IA A2 (PCB issues deferred to DTSC and EPA)
 - b. Final Onshore ERA (Deferred to EPA and DTSC. Staff understands the conclusions of this document will be used in subsequent remedial investigations and subject to review by all agencies at that time)

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- c. PCB Report for Parcel XVI (PCB issues deferred to DTSC and EPA)
 - d. Draft Greensand HHRA Addendum (human health risk issues regarding abrasive blast material are deferred to DTSC)
 - e. Draft Amended SMP 2004 (this document is superseded by the current Draft SMP)
5. The SMP is the primary planning tool for the environmental program at Mare Island. Therefore, backlogged documents should be placed into the forward-looking review schedules for the appropriate investigation area. A proposed review date should be provided for each document, with consideration of the priority of each.
 6. Item BW-13 ("Agency Comments on Navy Letter Moving Suspect Tanks to Not Located Tanks" issued 9/21/93) is not available in Water Board files. Please submit an additional copy for review.
 7. Water Board staff concurs with DTSC that a Finding of Suitability to Lease (FOSL) should be prepared for the use of offshore areas. Interim use of these areas, in the absence of any restrictions, may complicate the investigation and remediation of sediments. Interim uses may disturb the sediment, rendering prior site characterization data potentially inaccurate and requiring resampling. Use of the offshore areas without restriction may also contribute additional pollution to sediments and, therefore, increase investigation and remediation costs while complicating liability issues. The Navy has, in the past, stated it cannot require the City of Vallejo and Lennar Mare Island to enter into any agreement regarding leasing of the offshore areas. Staff believe a FOSL is necessary for this area to ensure environmental protection and the integrity of the Navy's investigation and cleanup during the lease period. This document should be added to the Investigation Area K (Offshore Sediments) schedule in the SMP.
 8. Table 2, page 4 of 10 lists munitions response program activities for the DRMO site. The proposed removal action will not address the petroleum product found at this site that extends on to the eastern early transfer parcel Investigation Area B. Investigation to determine the nature and extent of petroleum contamination in soil and groundwater at the DRMO is necessary and should be programmed into the SMP schedule for the site. Alternatively, this issue may be addressed in the RI/FS for the site, providing these documents fully include petroleum investigation and remediation.

If you have any further questions regarding this matter, please contact me at (510) 622-2462 or via email to gjr@rb2.swrcb.ca.gov.

Sincerely,



Gary J. Riley, P.E.
Water Resource Control Engineer
Remedial Project Manager

Distribution:

Mr. Chip Gribble - DTSC
Ms. Carolyn d'Almeida - US EPA
Ms. Brenda McConathy - TetraTech EM, Inc.