



California Regional Water Quality Control Board

San Francisco Bay Region



Alan C. Lloyd, Ph.D.
Agency Secretary

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.swrcb.ca.gov/rwqcb2>

Arnold Schwarzenegger
Governor
N00221_003595
MARE ISLAND
SSIC NO. 5090.3.A

Date: **FEB 08 2005**
File No. 2129.2011 (GJR)

U.S. Department of the Navy
BRAC Program Management Office - West
Attn.: Mr. Jerry Dunaway
1230 Columbia St., Ste. 1100
San Diego, CA 92101-8571

SUBJECT: Staff Comments on Draft Removal Action Work Plan, Non Time-Critical Removal Action for the Fenced Scrapyard Area of the Defense Reutilization and Marketing Office Site, Former Mare Island Naval Shipyard, Vallejo, California (December 10, 2004)

Dear Mr. Dunaway:

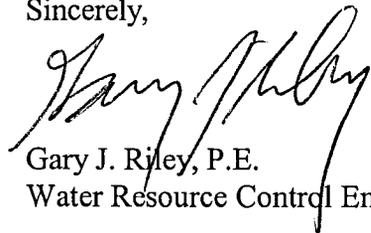
Water Board staff has reviewed the above-referenced report and submits the following comments:

1. Section 1.2.2, Page 1-5: The text states storm drains flow to the west of the DRMO site. From examination of Figure 3-1 (and others) it is not clear that storm drains only flow to the west, and not to the east, of the site. If storm drains are removed and plugged, provisions must be made to ensure storm drain service is not interrupted for upstream drainage. Excessive ponding of water upstream could result in increased erosion from off-site.
2. Section 3.3.5, Page 3-8: The report states storm drain inlet and outlet flows will be terminated using concrete or bladder plugs. The latter method should not be used since these plugs may fail and do not provide long-term stoppage of flows. Plugging storm drain inlet lines should also be evaluated in light of comment number 1 above.
3. Section 3.4.7, Pages 3-13 through 3-15: Petroleum contamination has been reported at the DRMO site, and free product has been observed in wells and utility corridors to the east of the DRMO. The proposed removal action does not address petroleum in soil or groundwater. Future work must be conducted in this area, and off-site, to remediate this pollution. Staff notes the Navy has taken responsibility for investigation and remediation of petroleum contamination at the DRMO and in adjacent areas of Investigation Area B in its January 25, 2005 letter to Mr. Gil Hollingsworth of the City of Vallejo.

4. Construction Storm Water Pollution Prevention Plan (CSWPPP), Figure 2-2: The line symbols for salt water pipelines and storm water pipelines are very similar and confusing. It appears some lines may be misidentified. The note on the figure "Demolish Lines O Fenecline" should presumably read "Demolish Lines To Fenceline." Arrows from this note point to what appear to be storm drain pipelines *and* salt water pipelines. Please clarify if the lines to the south end of the DRMO are in fact salt water pipelines and whether they are to be demolished.
5. CSWPP Figure 2-2 and Section 2.2.4: There appear to be two separate storm drainage systems for the DRMO: one to the north and east, and one to the south and west. The text states storm drains are believed to flow to the west and discharge into surface water at a wetland west of the site. It is not clear where or how the storm drains serving the northeast portion of the site drain to the west, since they appear to lack a connection to the western side of the site. Please provide clarification in the narrative section of the text. Also, Figure 2-2 needs to be amended to comply with the minimum site map requirements of SWRCB General Permit No. CAS00002 by clearly labeling: storm water collection and discharge points and the anticipated location(s) where the storm water from the construction site discharges to a municipal storm sewer system or other water body. The figure must also show the receiving water bodies for storm water discharges from the site.
6. CSWPP, Section 4.3: The General Permit requires a sampling and analysis plan for pollutants which are not visibly detectable in storm water discharges that are or should be known to occur on the construction site. Petroleum hydrocarbons are known to occur at the DRMO and, while not the subject of this removal action, need to be added to the sampling plan. Since the characterization and remediation of petroleum in soil and groundwater at this site remains incomplete, petroleum-related compounds such as PAHs also need to be included in the proposed sampling.

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

Sincerely,



Gary J. Riley, P.E.
Water Resource Control Engineer

Distribution on following page

Mr. Jerry Dunaway

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Distribution:

Mr. Chip Gribble
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, California 94710

Ms. Carolyn d'Almeida
U.S. EPA
75 Hawthorne Street (SFD-8-1)
San Francisco, California 94105