



California Regional Water Quality Control Board

San Francisco Bay Region



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MARE ISLAND
SSIC NO. 5090.3.A

Date: FEB 15 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 Engineering Evaluation/Cost Analysis: 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 (August 10, 2004)

Dear Mr. Dunaway:

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

1. Section 2.1.5, Page 2-5: Figure 2 is cited as providing details on the storm drain system and drainage pattern for the site. This information is not apparent on the figure. Please revise the figure to include the referenced information, including the specifics of the storm water conveyance system and its discharge to surface waters.
2. Section 2.3.3, Page 2-16: The text states petroleum contamination will be addressed in tasks subsequent to this removal action because “[petroleum hydrocarbons] do not appear to pose a risk of exposure as compared to CERCLA COPCs.” A 2000 Internal Draft Remedial Investigation for the DRMO site is cited as the basis for this conclusion. The Water Board has not been provided with a copy of this report and, therefore, staff cannot concur with this statement lacking substantial supporting information. The Navy may choose to address petroleum contamination in soil and groundwater with a later action, but the statement regarding risk is inappropriate at this time and should be removed from the EE/CA.
3. Appendix F, Table F-2, Page 2 of 3: The discussion of potential ARARs is confusing. With respect to the Water Board Basin Plan, it is determined to provide “State Advisory Criteria”. The comments supporting this conclusion discuss Tier II TBC (“to be considered”) criteria developed for petroleum hydrocarbons in Investigation Area C3. The DRMO is not located

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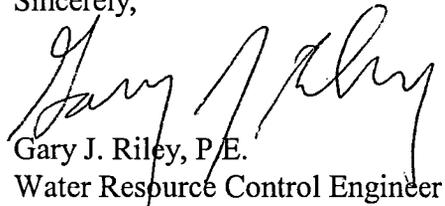
Mr. Jerry Dunaway

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within IA C3 and it is inappropriate to use an ARAR evaluation for IA C3 at the DRMO. Table F-2 needs to be revised to address the Basin Plan's applicability to the DRMO site. Staff notes the numeric and qualitative water quality standards in the Basin Plan apply to all surface and ground waters of the State. This includes groundwater at the DRMO and storm water runoff from the site, as well as to waster discharges to soil with the potential to affect water quality.

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

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