



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_003597
MARE ISLAND
SSIC NO. 5090.3.A

Date: **APR 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 Sampling and Analysis Plan Addendum (Field Sampling Plan/Quality Assurance Project Plan) Additional Characterization at the Former Degreasing Plant Investigation Area C2, Former Mare Island Naval Shipyard, Vallejo, California (January 14, 2005)

Dear Mr. Dunaway:

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

1. Section 1.1.5.3, Page 15: This section asserts the high levels of petroleum in groundwater (up to 164 mg/l) are the result of leaks from the fuel oil pipelines and migration through and along storm drain lines and in groundwater. Concentrations at this level are indicative of free-phase hydrocarbons because they exceed the expected solubility of heavier-end petroleum hydrocarbons in groundwater. The source of the petroleum contamination and free-phase product must be investigated and addressed in accordance with State Water Resource Control Board Resolution 92-49. Since the Navy asserts this pollution is the responsibility of the City of Vallejo and Lennar Mare Island, Water Board Staff request that the Navy and Lennar provide written correspondence to the Board describing the responsibility for and proposed action for this petroleum release.
2. Section 1.2., Page 23: The Navy proposes to sample groundwater from three monitoring wells "over two quarters (wet and dry season)". Staff notes two rounds of quarterly sampling, which by definition would occur with the second sampling round taking place three months after the initial round, would not be sufficient to capture the wet and dry-season variations that take place on an annual basis. Seasonal variations are likely to play a role in the hydrogeology of this site; therefore three quarters of quarterly sampling would be appropriate in this case.

Preserving, enhancing, and restoring the San Francisco Bay Area's waters for over 50 years

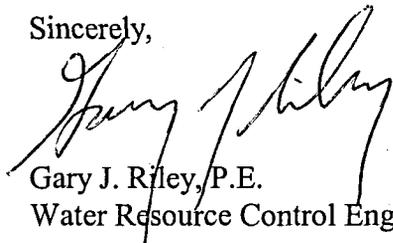
Mr. Jerry Dunaway

- 2 -

3. Section 1.2, Page 23: The second round of groundwater samples is proposed for VOC analysis only. Potential seasonal variation in groundwater conditions requires wet and dry season sampling for all constituents. Since petroleum hydrocarbons are an identified contaminant of concern at this site, groundwater samples should be analyzed for TPH by the party that is affirmatively taking responsibility for the investigation and cleanup of the petroleum release.

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

Sincerely,



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

Distribution:

Lennar Mare Island, LLC
Attn.: Ms. Sheila Roebuck
690 Walnut Avenue, Suite 100
Vallejo, California 94592

CH2M Hill, Inc.
Attn.: Mr. Jeffery C. Morris, P.E.
155 Grand Avenue, Suite 1000
Oakland, California 94612

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