



California Regional Water Quality Control Board

San Francisco Bay Region



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Arnold Schwarzenegger
Governor

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MARE ISLAND
SSIC NO. 5090.3.A

Linda S. Adams
Secretary for
Environmental Protection

APR 3 2007

Date
File No. 2129.2011 (BJT)

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

Subject: Comments on the *Draft Expanded Site inspection Report Building 742, Former Degreasing Plant, Investigation Area C2*, dated June 30, 2006, Mare Island, Vallejo

Dear Mr. Bloom:

We have reviewed the subject report and generally concur with recommendations for further investigation and corrective action. Additional work should consider the following comments.

1. Corrective action is required to stop surface water from commingling with subsurface pollutants through the broken storm water pipeline. The report indicates that water traveling through the pipeline is influencing shallow groundwater and causing flow reversals with tidal swings in Mare Island Strait. The potential for surface water to dissipate and cause further migration pollutants in the subsurface and for pollutants to be transported along the utility directly to Mare Island Strait needs to be mitigated.
2. Screening levels and data evaluations need to consider threats to the environment (including ecological and aquatic habitats, surface water, and groundwater) in addition to human health.
3. Characterization and evaluation of petroleum hydrocarbons shall consider both gross pollution by total petroleum hydrocarbons (TPH) and contamination by indicator chemicals, as discussed in *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater* (<http://www.waterboards.ca.gov/sanfranciscobay/esl.htm>).
4. We concur that additional investigation is necessary to determine the nature and extent of pollutants. This includes the need to further investigate the sources of pollutant releases such as the tanks, pits, the Foundation Grinder Sump, and the oil-water separator identified on historic plan maps. Also, the extent of pollutants along subsurface utilities and separate-phase hydrocarbons (petroleum product) need to be sufficiently characterized.

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5. Revise how soil gas samples are reported and discussed. Soil gas samples were collected at shallow depths due to the presence of shallow groundwater. Based on regulatory concerns over collecting representative soil gas samples near the surface (since breakthrough of ambient air and changes in barometric pressure and temperature may effect the quality of data obtained from the sample), we do not understand why drive casing was retracted 18 inches to collect shallow soil gas samples. Samples reported to be from a depth of 3.5 feet below the ground surface actually collected soil gas between depths of 2 and 3.5 feet. The quality of soil gas samples that were collected within 5 feet of the ground surface needs to be considered in evaluations of the data.
6. Label hydrographs (Figures 8 and 9) with a reference datum. Interpretation of the hydrographs requires knowing if the changes in water levels are relative to the ground surface or surveyed elevations.

Please contact me at (510) 622-2422 or via email at brthompson@waterboards.ca.gov if you have any questions.

Sincerely,



Brian Thompson, CHG, CEG
Engineering Geologist