

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION
1111 JACKSON STREET, ROOM 6040
OAKLAND 94607Phone: Area Code 415
464-1255July 19, 1988
File No. 2129.2011B (LWT)Mr. William Cornils
Head, Environment-Energy Management
Division, Code 460
Mare Island Naval Shipyard
Vallejo, CA 94592

Subject: 900 Area—Revisions to Sampling Plan

Dear Mr. Cornils:

This is follow-up to the discussion between you, Mr. John Pearson of your staff, and Ms. Lila Tang of my staff during a site inspection of the 900 Area on June 24, 1988. The bases for the discussion were your letter of June 10, 1988 and the letter from your consultant, IT Corporation, dated June 20, 1988.

Your letter transmitted previously agreed upon revisions to the sampling plan. Nickel was one of the list of chemical analytical parameters we had agreed upon and should be added to the list contained in the revised plan. Other than this, the other revisions are acceptable.

IT Corporation's letter from Paul Kuhlmeier, brought out two issues concerning chemical analytical protocol. These two issues should be handled as follows:

1. The Waste Extraction Test should be performed on soil samples which have total concentrations over the California Soluble Threshold Limit Concentration (STLC) or over background concentration if a STLC is not listed.
2. IT Corporation's proposal to analyze total tin content and then to further analyze for the organotin percentage if the total tin content exceeds the background value is unacceptable. At a minimum, sediment samples taken from locations which are likely to be in contact with water from Mare Island Strait must be analyzed for organotins.

We have received your revised schedule calling for submittal of a remedial action plan by September 25, 1988. Please be aware that you are currently in violation of Specification B.3.b. of Order No. 87-170. We will decide on appropriate enforcement action, if any, after we receive and review the reports completed for this investigation. Timeliness and cooperation will be factors in the consideration.

Mr. Cornils
page 2

July 19, 1988

If you have any questions, please call Shin-Roei Lee at (415) 464-4212 or 464-1255.

Sincerely,



Steven R. Ritchie
Executive Officer

cc: Al Wanger, DHS/TSCD
Karen Scheuermann, EPA
Cliff Covey, Solano County Dept. of Public Health
Mitch Whorton, City of Vallejo
Dean Peterson, Western Div., NFEC
Paul Kuhlmeier, IT Corp.