



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

Date **OCT 24 2006**
File No. 2129.2011 (BJT)

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

Subject: Comments on Review of Field Variance Forms for PCB Sampling, Site Investigation, and UST Sites A-225 and A-267, Investigation Area F1, Mare Island, Vallejo, California

Dear Mr. Bloom:

This letter provides our comments on three Field Variance Form documents for Investigation Area F1. The three Field Variance Forms were submitted for conducting: (1) sampling for polychlorinated biphenyls (PCBs); (2) further investigation within Investigation Area F1, and (3) additional investigation for underground storage tank (UST) sites A-225 and A-267. We have the following comments.

1. *Final Field Variance Form For PCB Sampling at Investigation Area F1, Mare Island, Vallejo, California*, dated September 11, 2006

This Field Variance Form relates to the PCB program that is subject to DTSC and EPA oversight. We defer comments to these agencies.

2. *Draft Site Investigation Sampling Field Variance For, Investigation Area F1, Mare Island, Vallejo, California*, dated September 19, 2006

We have no comments.

3. *Draft Underground Storage Tank Sampling Field Variance Form Investigation Area F1, Mare Island, Vallejo, California*, dated October 2006

This Field Variance Form proposes further investigation of soil and groundwater quality in the vicinity of UST Sites A-225 and A-267 through the installation of two groundwater

monitoring wells (one well for each site). We concur with the plan for additional investigation and have the following comments on the proposed work.

- This letter does not provide comments on the proposed monitoring well locations. The document does not include information for us to review suitability of the proposed locations, such as chemical data and subsurface lithology.
- In general, we concur with the installation of monitoring wells to meet objectives that require repetitive sampling over time, such as for evaluating compliance, containment, natural attenuation, etc. For the purpose of investigating groundwater quality to determine the extent of contamination, we recommend considering other methods that can be more cost-effective.
- The placement of well screens during monitoring well construction needs to consider not only where groundwater is encountered during drilling but also the anticipated seasonal fluctuations in groundwater level.
- The sampling plan proposes collecting soil samples between depth intervals of 0 to 1 foot, 3 to 5 feet, and 5 to 10 feet below the ground surface. We understand that soil samples will be collected within these intervals at locations which appear to be the most contaminated based on field screening methods. We recommend, in the absence of detectable contamination, that one of the samples be collected near and above where groundwater is encountered.

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

Sincerely,



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Engineering Geologist

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