



California Regional Water Quality Control Board

San Francisco Bay Region



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Governor

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MARE ISLAND
SSIC NO. 5090.3.A

Letter sent via email

Date: May 20, 2008
File No. 2129.2011 (BJT)

Department of the Navy
BRAC Program Management Office
Attn: Mr. Michael Bloom
1455 Frazee Road, Suite 900
San Diego, CA 92108-4301
michael.s.bloom@navy.mil

Lennar Mare Island, LLC
Attn: Mr. Neal Siler
690 Walnut Avenue, Suite 100
Vallejo, California 94592
neal.siler@lennar.com

Subject: Investigation for Characterizing the Nature and Extent of Petroleum Hydrocarbon Discharges - Defense Reutilization and Marketing Office (DRMO), Crane Test Area, and Investigation Area B of the former Mare Island Naval Shipyard, Vallejo, Solano County.

Dear Mr. Bloom and Mr. Siler:

I have coordinated preparation of this letter with the Department of Toxic Substances Control to provide our joint comments on the current approach towards investigating petroleum hydrocarbons in the vicinity of the DRMO. For the purposes of this letter, the DRMO vicinity includes at least the DRMO area, the Crane Test Area, and portions of Investigation Area B near the DRMO.

We received updates on petroleum hydrocarbon investigations within the DRMO vicinity at the Restoration Advisory Board (RAB) meeting of April 24, 2008 and during our monthly cleanup team meetings. The Department of the Navy (Navy) recently conducted an investigation which included test pit excavations and geophysical surveys to further characterize the extent of separate-phase petroleum in the DRMO vicinity. For reasons unclear to us, the regulatory agencies were not provided an opportunity to review the work plan for this investigation. Now that the investigation activities have been completed, we are awaiting receipt of the investigation report to provide our comments. Pending submittal of this report, there are two important issues that we hope are addressed.

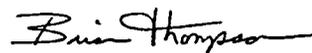
1. **Characterization of the nature and extent of petroleum hydrocarbons associated with the DRMO area within Investigation Area B.** We understand that the Navy retains responsibility for investigation and cleanup associated with the DRMO area and that Lennar wants the petroleum-affected areas of Investigation Area B (associated with the DRMO) delineated in order to move forward with redevelopment activities. The nature and extent of separate-phase petroleum and petroleum hydrocarbons in other media (soil, soil gas (if applicable), and groundwater) need to be characterized. Characterization efforts need to include investigation of utility corridors as potential conduits for petroleum hydrocarbon migration.

2. **Evaluation of petroleum hydrocarbons within known landfill disposal areas.** Preliminary information suggests a positive correlation between the occurrence of separate-phase petroleum in the subsurface and the presence of buried debris. This new information is of concern because of past disposal practices in the DRMO vicinity. The presence of separate-phase petroleum in the following landfill disposal sites needs to be evaluated:
 - The Crane Test Area – used as a disposal site between approximately 1925 and 1942.
 - Investigation Area B.2 – used as a disposal site in the 1910's and 1920's (between approximately Dump Road/A Street and the southeastern extent of Installation Restoration Site 01) and in the 1920's and 1930's (between approximately Pintado Street and Dump Road/A Street).

In addressing the aforementioned issues, the regulatory agencies encourage continued collaboration between the Navy and Lennar.

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

Sincerely,



Brian Thompson, CHG, CEG
Engineering Geologist

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