



California Regional Water Quality Control Board

San Francisco Bay Region



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MARE ISLAND
SSIC NO. 5090.3.A

Date: February 1, 2010
File No. 2129.2011 (EKW)
GeoTracker No. T0609560708

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

SUBJECT: Comments on the *Draft Action Memorandum, Building 742 Former Degreasing Plant, Within Investigation Area C2, Former Mare Island Naval Shipyard, Vallejo, California, dated December 18, 2009*

Dear Mr. Bloom:

I reviewed the December 18, 2009, Draft Action Memorandum for the Building 742 Former Degreasing Plant. Water Board staff comments are presented below.

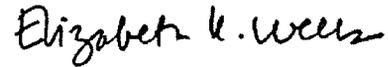
1. Section 5.1.1: Include a statement indicating that following the first year (four quarters) of groundwater monitoring, the Navy will meet with the regulatory agencies to discuss the results and determine the path forward. This path forward may include additional groundwater sampling, which Water Board staff requested in its March 5, 2009, comments on the Draft EE/CA/IRAW¹.
2. Section 5.2.5.3, Stormwater ARARS: The State Water Resources Control Board adopted a new Construction General Permit (Adopted Order 2009-009-DWQ) that goes into effect July 1, 2010. The reference to "SWRCB Res. 99-08-DWQ" is incorrect; the correct reference is Water Quality Order 99-08-DWQ, dated August 19, 1999. The Navy should be aware that the 1999 Order will be superseded by Order 2009-009-DWQ. Based on the Navy's proposed schedule, Order 2009-009-DWQ should be followed. Review this Order to assess its applicability to the proposed site work and revise the text accordingly.
3. Section 5.2.5.3, State Waste Disposal ARARS: Delete California Health and Safety Code §25157.8 as an ARAR. The requirement of §25157.8 (e) regarding disposal of soil containing lead at concentrations greater than or equal to 350 parts per million expired in July 2006.

¹ EE/CA/IRAW = Engineering Evaluation/Cost Analysis/Interim Remedial Action Plan

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If you have any questions, you can contact me via phone at (510) 622-2440 or e-mail at ewells@waterboards.ca.gov.

Sincerely,



Elizabeth Wells, PE
Water Resource Control Engineer

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