

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105



March 4, 2010

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

RE: Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) for the J Lines Section Exterior of Installation Restoration Site 14, Former Mare Island Naval Shipyard, Vallejo, CA December 15, 2009

Dear Mr Bloom:

EPA has reviewed the draft Sampling and Analysis Plan for the exterior of the J lines segment of the former industrial wastewater pipeline at former Mare Island Naval Shipyard. EPA previously submitted comments on the Technical Memorandum for this site, some of which continue to be carried over into our review of the draft Sampling Plan:

1. Groundwater Data. EPA previously requested that all of the groundwater data available for the site be presented. It appears from the Groundwater Summary section 10.7.2 that Navy has made a determination that that groundwater has not been impacted by releases from the J lines based upon a very limited regional data set that may not be representative of the entire pipeline area. It appears that the Navy's basis for not further evaluating impacts to groundwater is based upon only 2 samples collected for VOCs, 3 samples for TPH, and only 1 sample for SVOCs. We recommend grab groundwater samples be collected from borings along the line that are associated with identified cracks and offsets in the pipeline.

2. Figure 3 showing previous and proposed sample locations has been improved with the addition of identified presence of greensand in previous borings and locations of cracks and offsets from the video survey of the pipeline. You have identified a one inch offset in the pipeline adjacent to former pump station 8 where both grab groundwater and soil data should be collected, but does not appear to have a sample location currently proposed. Please include characterization of this area.

3. Figure 3 does not identify sample ID numbers. The locations of specific sample ID numbers and analytical requests are not correlated to specific locations. Please clarify in the next version of the SAP.

4. Based upon the results of soil and ground water sampling it may be appropriate to collect soil gas samples as well.

Thank you for the opportunity to review these reports, if you have any questions, please contact me at (415) 972-3150.

Sincerely,



Carolyn d'Almeida
Remedial Project Manager

cc: Janet Naito, DTSC
ElizabethWells, RWQCB

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