



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
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Governor

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MARE ISLAND
SSIC NO. 5090.3.A

Letter sent via email

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File No. 2129.2011 (PJ)
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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

SUBJECT: Comments on the *Draft Non-Time-Critical Removal Action Work Plan, Installation Restoration Site 17 and Building 503 Area, Former Mare Island Naval Shipyard, Vallejo, California, dated August 31, 2009*

Dear Mr. Bloom:

Thank you for providing the Water Board with the *Draft Non-Time-Critical Removal Action Work Plan, Installation Restoration Site 17 and Building 503 Area, dated August 31, 2009*. Water Board staff has reviewed the above-reference document and have the following comments.

GENERAL COMMENTS

1. The Final Engineering Evaluation/Cost Analysis/Interim Remedial Action Plan (EE/CA/IRAP), finalized in June 2009, identified Alternative 5 (soil excavation, off-site disposal, and backfilling) as the recommended alternative, which could serve as the final site action. The Navy does not propose to collect confirmation samples from the excavations (except for Excavation C, where free product has not been identified). Without quantifiable data to show that free product has been removed, it will be difficult to evaluate this remedial action as the final site action. The Water Board requests confirmation samples be collected from the sidewalls and bottoms of the excavations (as proposed for Excavation C). Other data collection options include; expanding the excavations to areas defined by previously collected acceptable soil samples, or collecting soil samples along the perimeter of the excavations after backfilling.
2. Section 5.8.1 indicates "before backfilling activities, accumulated groundwater (if 6 inches deep or greater) will be managed as described in Section 5.4". There is no discussion of how the groundwater will be managed if less than six inches deep, and/or free product is present. If any free product, including sheen, is present on groundwater (no matter the depth of groundwater) all attempts shall be made to remove the free product and groundwater prior to backfilling the excavation.

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Please contact me at (510) 622-2756 or pjorgensen@waterboards.ca.gov if you have any questions.

Sincerely,



Paisha Jorgensen, PG
Engineering Geologist

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