



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
Environmental Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.waterboards.ca.gov/sanfranciscobay>

Arnold Schwarzenegger
Governor

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MARE ISLAND
SSIC NO. 5090.3.A

Date DEC 22 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 Responses to Regulatory Agency Comments on a Draft Remedial Action Plan and Record of Decision Document for Installation Restoration Site 17 at the Former Mare Island Naval Shipyard, Vallejo, California

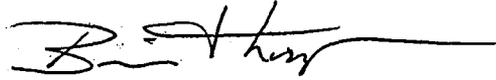
Dear Mr. Bloom:

We have reviewed a November 16, 2006 letter which provided Department of the Navy responses to regulatory agency comments on the *Draft Remedial Action Plan/Record of Decision for Installation Restoration Site 17, Mare Island, Vallejo, California*, dated May 16, 2006, and we have the following comments.

1. We would like to reiterate the importance of our first comment (general comment number one). Judicious efforts spent removing free product source can significantly reduce the time frame needed for residual pollution to naturally attenuate. We feel that in order to remove source material to the maximum extent possible, the remedial action plan needs to consider all lines of evidence. Based on a conceptual understanding of the release site and knowledge from literature of how petroleum migrates through the subsurface, it is reasonable to project that the isolated occurrences of free product source may have a subsurface connection between them and with the presumed release site. We request that the remedial action plan actively consider this possibility. We would like to see test pits excavated between the occurrences of free product shown on Figure F-1, the known product areas, and the above ground storage tanks locations, presumed to be the source of the release.
2. We understand that a number of our comments will be addressed by a remedial design plan, which provides more detail on how the remedial action plan will be implemented. We look forward to reviewing this document.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Thompson", with a long horizontal flourish extending to the right.

Brian Thompson, CHG, CEG
Engineering Geologist

Distribution:

Mr. Chip Gribble
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, Ca 94710-2721

Ms. Carolyn d'Almeida
U.S. EPA Region 9 (SFD 8-1)
75 Hawthorne Street, 9th Floor
San Francisco, CA 94105