



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
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TREASURE ISLAND
SSIC NO. 5090.3.A

June 11, 2007
File No. 2169.6013 (AF)

Mr. Charles Perry
U.S. Department of the Navy
BRAC Program Management Office – West
1455 Frazee Rd., Suite 900
San Diego, CA 92108-4310

SUBJECT: Water Board Comments on the May 2007 Draft Sampling and Analysis Plan (Field Sampling Plan/Quality Assurance Project Plan) for the Field Investigation of Lead Shot at Installation Restoration Site 27, Clipper Cove Skeet Range, Naval Station Treasure Island, San Francisco

Dear Mr. Perry:

The subject report was generally well written and thorough. If you would like to discuss the comments below, you can contact me via phone (510) 622-2401 or email at AFarres@waterboards.ca.gov.

Specific Comments:

1. Section 1.1.6: This section presents the screening criteria for Site 27 as more than one lead shot present in any sampling grid. To provide a frame of reference for the screening criteria, provide information on the size and depth of each sampling grid. This comment also applies to Table 3, Step 7.
2. Section 1.2.1: During the sediment investigation, data on grain size, total organic carbon, and benthic biomass will be collected in the upper three inches. Explain the purpose of collecting this additional data (e.g. benthic biomass provides a food source resulting in suitable habitat for diving ducks).
3. Table 3, Step 3: Include a bullet for secondary data such as grain size, total organic carbon and benthic biomass.
4. Table 3, Step 5: This step identifies the following decision rule "If less than two lead shot are identified in all six inch intervals in a sampling grid then the sampling grid will not be

addressed in the FS; otherwise, the sampling grid will be addressed in the FS". Specify the dimensions of the 6-inch sampling intervals. Also, the decision rule could be misinterpreted as less than two lead shot in **each** six-inch interval in a sampling grid. For clarity and consistency, the decision rule or screening criterion should be restated similarly throughout the report as "more than one lead shot present in any sampling grid".

5. Table 3, References: Correct the 2nd reference to "San Francisco Regional Water Quality Control Board".

Sincerely,

Agnes Farres
Project Manager

Distribution:

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