



# California Regional Water Quality Control Board

## San Francisco Bay Region



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Terry Tamminen  
Secretary for  
Environmental  
Protection

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Arnold Schwarzenegger  
Governor

Date: JUN 29 2004  
File No. 2129.2078 (GJR)

Department of the Army  
U.S. Army Engineer District  
Sacramento District, Corps of Engineers  
Attn: Ms. Meegan Nagy  
1325 J Street (CESPK-PM-H)  
Sacramento, California 95814-2922

**Subject: Staff Comments on Final Expanded Site Inspection Field Site Investigation Plan for the Former Benicia Arsenal, Solano County (April 2004)**

Dear Ms. Nagy:

Staff of the Regional Water Quality Control Board has reviewed the above-referenced Field Site Investigation Plan (FSIP). In general, the document presents a well-designed, dynamic sampling approach that is appropriate for characterization of this large site on an expedited basis. Specific comments are as follows:

**General:** Water Board staff requested inclusion of additional sites in the FSIP in comments on the *Draft Preliminary Assessment* and in further comments on the *Final Preliminary Assessment*. As described in a June 1, 2004 letter, staff believes the following sites require further investigation: DOD Sites 177, 195, 48, 49, 70, 92, 98, 99 118(B), 179, and Nike Missile Sites 1 and 2. Please see Water Board comments on the *Preliminary Assessment* for a complete listing of sites where further action is necessary under the Porter-Cologne Water Quality Control Act and State Water Resources Control Board Resolution No. 92-49.

**General:** The Executive Officer requested a Source Evaluation Report on Emergent Chemicals for the former Benicia Arsenal in a June 13, 2003 letter to Mr. Michael Mitchener of the Army Corps of Engineers. The Army has not submitted the requested response to this letter. Water board staff comments on both the *Draft Preliminary Assessment* and the *Final Preliminary Assessment* directed sampling for emergent chemicals at a number of sites. The Army has deferred a response awaiting DOD policy guidance. The lack of a detailed response and sampling for emergent chemicals leaves a

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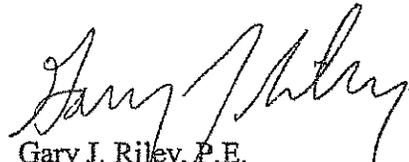
continuing data gap in the Arsenal-wide investigation that must be addressed prior to final Water Board concurrence on investigation and remedial decision documents.

**Section 2.4.2:** This section correctly states that the Geofon UST removal report (2002) recommended additional soil and groundwater investigation at a number of Area I UST sites. Water board staff concurred with this recommendation in written correspondence to the Army. Staff note that no soil investigation is proposed in the FSIP to delineate the soil contamination observed at the former UST locations. The downgradient groundwater sampling proposed in the subject FSIP may address some groundwater concerns, but source area soils remain incompletely characterized and will require future investigation.

**Diagram 5-1:** This figure shows the flowchart for the FSIP sampling process and step-out sampling criteria. In cases where no groundwater is encountered in borings, a soil gas sample will be collected only if an existing building is nearby. This sampling approach does not address potential indoor air impacts from contaminated soils at locations where buildings may be constructed in the future. Areas of VOC soil contamination will need to be addressed in a future remedial investigation to assess future risks to site users, including those risks attributable to vapor intrusion.

If you have any questions please contact me at (510) 622-2462 or via email to [gjr@rb2.swrcb.ca.gov](mailto:gjr@rb2.swrcb.ca.gov).

Sincerely,



Gary J. Riley, P.E.  
Water Resource Control Engineer  
Remedial Project Manager

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