

# San Diego Bay Environmental Restoration Fund – North and South

450 Montbrook Lane  
Knoxville, TN 37919  
Phone: (865) 691-5052

Via Email

March 6, 2017

Charles Cheng, PG  
Engineering Geologist  
San Diego Regional Water Quality Control Board  
2375 Northside Drive, Suite 100  
San Diego, CA 92108-2700

Re: Post Remedial Monitoring  
San Diego Shipyard Sediment Site  
Cleanup and Abatement Order No. R9-2012-0024  
Geotracker Site ID No. T10000003580

Dear Mr. Cheng:

On behalf of BAE Systems and NASSCO, we are pleased to receive the San Diego Regional Water Quality Control Board (Water Board) letter dated November 23, 2016 in which the “Final Cleanup and Abatement Completion Report, San Diego Shipyard Site” was approved. This letter has been prepared to provide further clarity with respect to the post remedial monitoring that will be conducted in 2018 and 2021.

Based on Sediment Quality Assessment Technical Support Manual (SCCWRP, Technical Report 777 – January 2014), the manual recommends that sampling be collected during the summer months when enclosed bays are stable and consistent year to year. As described in this guidance *“Samples are optimally collected during a summer index period from July to September. Physical environments in many enclosed bays are stable and most similar from year to year in the summer. Benthic community composition and abundances have similar stability patterns; measurement of benthic community disturbance is therefore most reliable when sampling is conducted in summer. Sediment samples for each type of analysis (i.e., toxicity, chemistry, and benthos) should be collected at the same time, in order to minimize variability associated with station positioning or seasonal events.”*

Consistent with the approved Work Plan for The San Diego Shipyards Post-Remedial Monitoring Plan (Exponent 2012) which states “...sampling activities in all years should be completed during the same season, preferably the summer months” and SCCWRP, January 2014 guidance document, monitoring is planned be conducted during summer months to minimize variability associated with seasonal events.

Based on the foregoing the anticipated schedule for sampling to be conducted in 2018 is as follows:

- Late 2017 to early 2018 prepare RFP for laboratory and sampling contractor, and execute contracts for work
- Prefield activities including but not limited to

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- Notice to Mariners, Shipyard Security, etc April 2017
- Review of Workplan and update as appropriate (See below): March to June 2018
- Notify RWQCB in accordance with Directive D, 2, a: "Notify the San Diego Water Board in advance of the beginning of sample collection activities in accordance with Provision G.6"
- Conduct Sampling in approximately July 2018
- Laboratory Analysis after all data is collected (~30 days),
- Prepare Draft data quality and usability report, once all data is received
- Submission of Post Remedial Monitoring Report, per the Sampling plan this is due 60 days after receipt of data

It is anticipated that the sampling to be conducted in 2021 would follow the same sequence and timing.

Should there be any questions regarding this schedule for the 2018 monitoring, please do not hesitate to contact me at 619-546-8377 ext. 103 or at [mpalmer@demaximis.com](mailto:mpalmer@demaximis.com).

Sincerely,



Michael A Palmer  
Project Coordinator

cc: Shaun Halvax, BAE Systems San Diego Ship Repair Inc. (via email)  
Sara Gobbi, NASSCO (via email)