

File Code: 2720

Date: January 22, 2014

Mr. Andrew Cooper
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, CA 95814

Dear Mr. Cooper,

Subject: Comment Letter – Digger Bay Marina Closure Summary

The Digger Bay Marina Site was reviewed for closure on January 7, 2010. The site was deemed ineligible for closure due to the groundwater being impacted above background.

In response to the State Water Board's Low Threat Closure Policy that became effective on August 17, 2012, the Digger Bay Marina Site is proposed for closure due to stability and/or decreasing of aerial extent of the contaminant plume. The case closure summary report states that water quality objectives have been achieved or nearly achieved for all constituents except MTBE in monitoring well MW-1, and total petroleum hydrocarbons as gasoline, benzene and MTBE in piezometer P-1.

A review of the documents associated with this case highlight that the groundwater in the shallow zone exhibit seasonal variation due to varying lake levels. A closer examination of historical monitoring data for the Digger Bay Marina Site shows: 1) that groundwater is only present in MW-1 and P-1 when the Shasta Dam reservoir elevation is above 1,030-ft which is usually from April through June depending upon annual precipitation and 2) elevated levels of contaminants in MW-1 and P-1 were observed in the May 2012 sample when the lake was at full lake level.

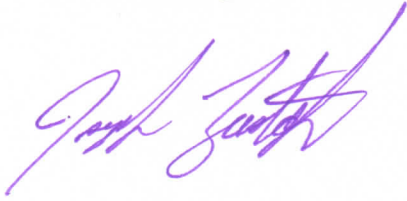
The Forest Service is concerned that the relationship between the seasonal variation in the ground water in the shallow zone and the varying lake levels has resulted in a single piece of monitoring data (May 2012) being used as the basis for stating that the contaminant levels are decreasing or have stabilized. We are also concerned that the Bureau of Reclamation's proposed project to raise Shasta Dam 18.5 feet, when approved and funded, will increase full lake level from 1,067-ft to 1,085-ft which may allow the existing contamination plume more time to migrate and perhaps broaden its contamination area.

The Forest Service requests that monitoring be continued at MW-1 and P-1 to validate that the seasonal fluctuation in the groundwater gradient has stabilized, confirm contaminant levels



are stabilized and decreasing, and ensure that the water quality objectives for MTBE will be achieved.

Sincerely,



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NATHAN REZEAU
Acting District Ranger

Cc: Howard Weinberg, Peloria Marinas
Bob Rollins, Bridge Bay Marina