

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
JACKSON STREET, ROOM 6040
OAKLAND 94607

Phone: Area Code 415
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Date: September 29, 1987
File No: 2169.6032 (WBH)

Attn: Commander Chris Guild
Code 09B
NAVCOM
P.O. Box 727
900 Commodore Drive
San Bruno, CA 94066-0720

Subject: Proposed Galley Site Investigation Report, Hunters Point
Naval Shipyard, San Francisco, CA

Dear Commander Guild,

This letter transmits the Regional Water Quality Control Board (RWQCB) staff's major comments regarding the subject site investigation report. RWQCB staff have the following comments:

1) RWQCB staff were not notified of the Galley Site investigation prior to receipt of the subject report. Similarly, the RWQCB had no knowledge of the Area Study for Asbestos Containing Material and Organic and Inorganic Soil Contamination prior to receipt of the report regarding that investigation. Excluding State agencies from the investigation process is not consistent with the Navy's asserted willingness to coordinate and cooperate with regulatory agencies. Communication with RWQCB staff prior to and throughout the investigative process should minimize the likelihood of misinterpretation of Regional Board policy.

2) The report states that no further investigation for petroleum hydrocarbons is warranted because hydrocarbon concentrations identified in soil samples were below levels specified in the RWQCB Fuel Leak Guidance Document. This determination is incorrect because it disregards the State Water Resources Control Board's Antidegradation Policy. The Antidegradation Policy applies to all sites where dissolved petroleum constituents are found in ground water and requires that cleanup to background levels (nondetectable levels for fuel constituents) be implemented unless the Regional Board specifies otherwise. The subject report indicates that polyaromatic hydrocarbons, indicative of petroleum hydrocarbons, were detected in a groundwater sample and therefore, further investigation is required.

Commander Christopher Guild

September 29, 1987

3) The Bioassay used to evaluate the acute toxicity of the site's soil on fish and to determine if the soil would be considered hazardous under Section 66696 of Title 22 of the CAC, was inadequate in the following respects:

a) The Bioassay only evaluated the toxicity of one soil sample. It has not been demonstrated that one soil sample is sufficient for suitable representation of site conditions. A scientifically credible sampling plan should be developed which will result in a collection of soil samples which adequately represent the average properties of the whole site.

b) The Bioassay describes fish mortality in various dilutions of the soil sample. While this test is appropriate to determine whether material from that soil sample should be considered hazardous under Title 22, it may not be indicative of all potential detrimental effects on the Bay's ecosystem, which may result from the migration of pollutants via surface or ground water.

I hope that the Navy will make a greater effort to coordinate with the RWQCB staff during future investigative efforts. This will assure a more efficient investigation/cleanup process at Hunters Point Naval Shipyard and minimize the necessity for repetition of work. If you have any questions regarding this matter, please contact William Hurley at (415) 464-0841.

Sincerely,



Roger B. James
Executive Officer

cc: Chein Kao, Department of Health Services
Amy Zimpfer, U.S. EPA, Region IX
David Wells, Environmental Health, City of San Francisco
Steve Castleman, S.F. Office of the District Attorney
Alex Dong, Naval Facilities Engineering Command
Joseph Ruzicska, Commander Naval Base