



# California Regional Water Quality Control Board

## San Francisco Bay Region

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Southwest Division  
1220 Pacific Highway  
San Diego, Ca 92132-5190  
Attention: Mr. Richard Mach

August 25, 2000  
File 2169.6032 (LBJ)

**Subject: Comments on Draft Action Memorandum, Time Critical Removal Action for Steam Lines, Fuel Lines, and Non-VOC Soil Sites at Parcels C and D, Hunters Point Shipyard, San Francisco, California.**

Dear Mr. Mach:

Regional Board staff have reviewed the document titled *Draft Action Memorandum, Time Critical Removal Action for Steam Lines, Fuel Lines, and Non-VOC Soil Sites at Parcels C and D, Hunters Point Shipyard, San Francisco, California* dated July 31, 2000 (action memorandum). Regional Board staff will defer to the US Environmental Protection Agency and the California Department of Toxic Substances Control regarding necessary content for action memoranda; however, we anticipate that many technical details including sampling and analysis will be addressed in subsequent submittals. Based on the topics discussed in the document we have identified the following concerns.

### 2.1.2 Physical Location

The site is directly adjacent to vulnerable habitats and natural resources, namely, San Francisco Bay. Although the Navy's activities have resulted in severe degradation of the quality of the adjacent habitat and waters of San Francisco Bay, the Bay must be considered as a whole to harbor vulnerable or sensitive populations, habitats, and natural resources. Please revise this language to reflect that these features exist adjacent to the Hunters Point Shipyard site and that protection of them is one of the primary goals of the project.

### 5.1.1 Proposed Action Description

Visual inspection of pipeline systems is very important if one is to effectively identify and remediate releases. Please revise the proposed action description also include inspection of the piping, appurtenances, and pipe trench for evidence of pipeline failure, stained soil, or odors.

Although we understand that this action is being performed under CERCLA, it seems appropriate to evaluate if Hunters Point petroleum criteria have been exceeded along the steam and fuel lines and remediate these areas as necessary. Please revise the document to address petroleum pollution or provide a reference to the document where these concerns will be addressed.

In the event that groundwater collects in fuel or steam line excavations, it will be appropriate to sample and analyze groundwater in addition to soil. In general, we recommend that a reasonable volume of groundwater be evacuated from the excavation prior to sampling. Please revise the document to indicate that groundwater will be sampled if it is encountered during pipeline removal.

#### **Table B-1 ARARs**

1. RWQCB asserts that the San Francisco Bay Basin Water Quality Control Plan (Basin Plan) is an ARAR. The Basin Plan specifies the beneficial uses, the water quality objectives, and an implementation plan to achieve these objectives for all surface and ground waters within the Region. We consider Chapters 1, 2, and 3 to be ARARS for all facilities undergoing site investigation and remediation regardless of whether soil or groundwater remediation is being contemplated.

- Chapter 1 identifies the beneficial uses for surface water at the site which include the following: ocean, commercial, and sport fishing; estuarine habitat; industrial service supply; fish migration and spawning; navigation; industrial process supply; preservation of rare and endangered species; water contact and non-water contact recreation; shellfish harvesting; and wildlife habitat. Groundwater at the site is considered to be a potential source of drinking water, although we believe the probability of use to be low. Cleanup goals for soils should be protective of the groundwater beneficial uses and cleanup activities must not result in an impact to surface water beneficial uses.
- Chapter 2 identifies the water quality objectives that must be met to sustain each of the beneficial uses identified above. Notably, groundwater discharging to the Bay must meet the narrative objectives for bioaccumulation, oil and grease, and toxicity. Since the groundwater underlying the site is currently considered to be a potential source of drinking water, maximum contaminant levels (MCLs) are also beneficial use objectives, however, given the low probability of use, the timeframe required to restore groundwater to MCLs is negotiable.
- Chapter 3 describes the implementation plan for the various RWQCB programs. In particular, this chapter describes the role of the RWQCB in federal facility cleanups and the general requirements for site investigation and remediation.

2. SWRCB Resolution 88-63 should be a "to be considered" (TBC). It identifies groundwater underlying the site as a potential source of drinking water. As such, soil cleanup goals at the site must be protective of this beneficial use of groundwater.

4. SWRCB Resolution 92-49 is a TBC. It specifies the measures that must be taken to cleanup and abate the effects of polluted groundwater. We understand that removal actions are contemplated only for soil in this case and this requirement specifically addresses the issues surrounding groundwater contamination. For this reason, it appears that 92-49 is not currently an ARAR. In the event that groundwater contamination is discovered during a removal action, Resolution 92-49 would become an ARAR. For this reason, we recommend that it be listed as TBC.

5. The following sections of the California Water Code are ARARs :
  - Section 13271 requires reporting of any unauthorized release of pollutants into waters of the state (including groundwater).
  - Section 13304 requires cleanup and abatement of any waste discharged into waters of the state (including groundwater) in violation of waste discharge requirements or prohibitions.
  
6. The following section of the California Health and Safety Code is an ARAR:
  - Section 2655 requires "The owner or operator shall remove free product to the maximum extent practicable..." and, furthermore, "A free product removal report shall be submitted to the agency within 45 calendar days of release confirmation..."

Should you have any questions regarding this matter, please contact me via email at [lbj@rb2.swrcb.ca.gov](mailto:lbj@rb2.swrcb.ca.gov) or at (510)-622-2400.

Sincerely,



Brad Job, P.E.

Assoc. Water Resources Control Engineer

cc:

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