



California Regional Water Quality Control Board

San Francisco Bay Region

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HUNTERS POINT
SSIC NO. 5090.3



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Governor

Winston H. Hickox
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Commanding Officer
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, Ca 92132-5190
Attention: Mr. Richard Mach

November 29, 2000
File 2169.6032 (LBJ)

Subject: Comments on Groundwater Beneficial Use Evaluation, Parcels C, D, and E, Hunters Point Shipyard, San Francisco, CA.

Dear Mr. Mach:

Regional Board staff has reviewed the document titled *Groundwater Beneficial Use Evaluation, Parcels C, D, and E, Hunters Point Shipyard, San Francisco, California* dated November 17, 2000. In general, we concur with the conclusions of the report, but find that there are several significant discrepancies with the document.

In particular, we take exception to the Navy's erroneous citation of State Water Resources Control Board Resolution 88-63. The Navy's evaluation incorrectly states that the criteria for a potential drinking water source are:

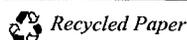
- "TDS concentrations exceed 3,000 mg/L (5,000 uS/cm, electrical conductivity)"
- "It is not reasonably expected by Regional Boards to supply a water system."

Please revise this section of the evaluation to reflect that all groundwater and surface waters in the state should be considered a potential source of drinking water except where:

- a. The total dissolved solids (TDS) exceed 3,000 mg/L and (emphasis added) it is not reasonably expected by Regional Boards to supply a public water system, or
- b. There is contamination, either by natural processes or by human activity (unrelated to a specific pollution incident), that cannot reasonably be treated for domestic use using either best management practices or best economically achievable treatment practices, or
- c. The water source does not provide sufficient water to supply a single well capable of producing an average, sustained yield of 200 gallons per day.

In addition, we are concerned that the document title does not reflect the true nature of the beneficial use evaluation as it relates to the beneficial uses of the B- and bedrock aquifers at the site. Please revise the document to reflect that the beneficial use evaluation pertains only to the A-aquifer, and that based on our current understanding, all deeper groundwater at the site is considered to be a potential source of drinking water. As such, all remedial efforts for the A-aquifer should be designed to ensure that pollution does not migrate into deeper aquifers. In the

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event that pollution is encountered in deeper aquifers, drinking water standards will be the applicable cleanup goals.

Should you have any questions on this matter, please contact me at (510)-622-2400.

Sincerely,



Brad Job, P.E.

Water Resources Control Engineer

cc:

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