



California Regional Water Quality Control Board

San Francisco Bay Region



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Environmental
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Mr. Richard Mach
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, Ca 92132-5190

May 9, 2001
File 2169.6032 (LBJ)

Subject: Groundwater Monitoring Strategy, Hunters Point Shipyard, San Francisco, CA

Dear Mr. Mach:

The purpose of this letter is to clarify our position on groundwater monitoring to ensure protection of the Bay as relates to potential revisions to the Parcel B Record of Decision (ROD) for Hunters Point Shipyard and to request that the Navy propose alterations to the ongoing monitoring programs at the site. We understand that there has been some misunderstanding regarding the RWQCB's recommended point of compliance and means of monitoring. We recommend that in addition to revising the Parcel B ROD, the groundwater-monitoring program for Parcels C and D should be similarly optimized to determine if polluted groundwater is migrating into the biologically active zone of the Bay at concentrations exceeding National Ambient Water Quality Criteria (AWQC) or HPS ambient. The revised approach would vary the point of compliance from the "high tide line of the tidally influenced zone" as is currently specified in the Parcel B ROD to strictly the "tidally influenced zone". In conjunction with this change, Regional Board staff recommends that the Navy propose a monitoring program that will demonstrate with certainty that groundwater plumes are not migrating into the biologically-active zone at concentrations in excess of AWQCs or HPS ambient.

Based on our understanding of the hydrogeology at HPS, there are several areas where concentrations of groundwater pollutants are high enough to cause concern that the polluted groundwater may be impacting beneficial uses of the Bay. Groundwater monitoring conducted at Parcel B pursuant to the Remedial Action Monitoring Plan (RAMP) currently considers the high tide line of the tidally influenced zone to be the point of compliance for demonstrating that impacts to the beneficial uses are not occurring. In its current implementation, the RAMP requires the Navy to meet AWQC or ambient levels in groundwater monitoring wells located a substantial distance from the shoreline in portions of the aquifer that may be hydraulically affected, but not chemically affected by tidal fluctuations. While this approach provides great assurance that impacts to the Bay are not occurring, it does so at a cost of recurrent false positive indications of groundwater impacts. Such false positives make it difficult to prioritize those sites where additional action must be taken.

The recommended change in the point of compliance would allow the Navy to demonstrate compliance by meeting the appropriate water quality objective just inland of the point where tidal

Mr. Richard Mach

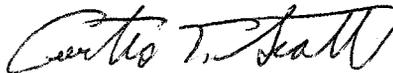
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mixing occurs. This approach allows the Navy to utilize natural attenuation mechanisms to the maximum extent practicable while still providing robust monitoring data that are not significantly affected by tidal mixing. Subsequent to revision of the ROD, the Parcel B RAMP will also require revision.

Therefore, we request that the Navy develop a monitoring approach for HPS that clearly demonstrates if an impact from polluted groundwater on surface water beneficial uses is likely to occur. Monitoring strategies that might be employed include use of time-integrated measuring apparatus such as diffusion samplers, approaches that demonstrate plume stability, and performance of site-specific attenuation studies. We make this request with the intention of allowing the Navy to develop a monitoring program that clearly protects beneficial uses, results in definitive response actions, optimizes resource expenditures, and provides a reliable mechanism to determine if and when groundwater monitoring may be curtailed. Should you have any questions on this matter, please contact Mr. Brad Job of my staff at (510)-622-2400.

Sincerely,



Curtis Scott

Division Chief, Groundwater Protection and
Waste Containment Division

cc:

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