

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

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December 12, 1990
File No. 2169.6032

Attention: Mr. Eddie Sarmiento

RE: Comments on Work Plan Volume 2F, Sampling Plan - Group V Sites, Remedial Investigation/Feasibility Study, Treasure Island, Hunters Point Annex

Dear Mr. Sarmiento:

The following are Regional Board staff's comments on the above mentioned Work Plan. As you probably know, 1984 State legislation required that the State Water Resources Control (SWRCB) Board compile a list of solid waste landfills which are "leaking" pollutants into adjacent water bodies. The legislation, known as the Caldron Act or SWAT law, requires landfill owners and operators to "test" their landfill to determine whether or not it is "leaking" (i.e., whether or not the landfills pose a threat to waters of the State and whether hazardous wastes are migrating offsite (Section 13273 of the California Water Code). All known landfills were listed by the SWRCB and placed in one of nine ranks and Hunters Point Annex appears on this list in the third rank. Third rank landfills had Solid Waste Water Quality Assessment Tests (SWAT's) due on July 1988. SWAT's generally require soil and groundwater monitoring at, and around, landfills for a minimum of one year.

On April 6, 1988, Staff of the Regional Board notified the Navy that four areas at Hunters Point Annex (HPA) should be evaluated using a SWAT. Those four areas are now included in the Navy's RI process; thus, much of the existing RI may fulfill SWAT requirements. Specifically these four areas consist of:

- o Industrial Landfill (IR-1),
- o Burn Disposal Area (IR-2)
- o Bay Fill Area (IR-2)
- o Disposal Trenches and Salvage Yard at 6th and J Street (IR-12)

Both IR-1 and IR-2 are part of Operable Unit #1. Operable Unit #1 areas are currently under investigation whereas IR-12, the Disposal Trenches Area, is proposed to be investigated under Operable Unit #5. Staff have limited their review to the aforementioned work plan for Operable Unit #5 (Group V) and staff did not review past workplans for Operable Unit #1.

SWAT guidelines¹ require vadose and saturated zone-sampling. Given the high water table at HPA, and the extensive soil sampling program proposed, no further vadose zone sampling would be necessary under SWAT. The existing and proposed on-site monitoring well network together will fulfill SWAT requirements for groundwater monitoring at IR-12. However, SWAT also requires off-site monitoring of surface and groundwater and my staff are concerned that the Navy have not adequately addressed this requirement in the work plan.

Monitoring wells in IR-1 and IR-2 may adequately monitor groundwater downgradient from the IR-12 site, but only in those areas. There is apparently an area between IR-1 and IR-2 where no sampling is proposed. Unless gradient contouring data conclusively show that this area could not be impacted by pollutants from IR-12, groundwater in this area should be monitored.

Additionally, SWAT guidelines recommend that all surface waters and springs within one mile, both up-gradient and down-gradient, of the site be sampled. In the context of HPA this would include an extensive Bay sampling program and sampling of the springs at Mountain Springs Water Company on Innes Avenue, near the HPA entrance gate.

The proposed Environmental Sampling and Analysis Plan (ESAP), currently under review and comment, may fulfill the SWAT requirement for downgradient surface water monitoring. However, based on the inadequacy of the first draft, at this time staff are not able to draw any conclusions as to whether the ESAP will fulfill this requirement.

With regard to the spring at Innes Avenue, The Navy should consider testing the water there, as it appears to be within one mile of the site. Because SWAT-regulated units are in separate operable units, and hence addressed in separate documents and implemented in separate time frames, the Navy may wish to prepare a single document which addresses the four SWAT areas and includes appropriate references to other RI/FS documents.

Please contact Tom Gandesbery, at (415) 464-0841 if you have questions.

Sincerely,



Lester Feldman, Section Leader
Toxics Cleanup Division

¹. Technical Guidance Manual, Solid Waste Water Quality Assessment Test (SWAT), Proposals and Reports, SWRCB, 8/88.

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