

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

WEBSTER STREET, SUITE 500
SAN FRANCISCO, CA 94133
(510) 464-1255January 22, 1992
File No.: 2169.6032(BMS)

Mr. Eddie Sarmiento
Code 84
Naval Station, Treasure Island
Building 1
San Francisco, CA 94130

Subject: Draft Final, Site Inspections: Sites PA-16 and PA-18 and Remedial Investigation Work Plan: Site PA-18, Naval Station, Treasure Island, Hunters Point Annex, San Francisco, California, January 2, 1992

Dear Mr. Sarmiento:

The staff of the San Francisco Bay Regional Water Quality Control Board (SFRWQCB) have completed their review of the above document received in our office on January 7, 1992. Presented below are general and specific comments that should be considered.

GENERAL

1. When will Removal Actions or Remedial Investigation Workplans be submitted for PA-16?
2. The question of whether or not the data gathered at PA-16 (and PA-18) may be appropriate for use as "background soil and groundwater chemistry" data (p. 7) has not been resolved. In light of recent developments in the understanding of contaminant distribution at HPA, specifically at OU-I, the assumptions that led to the original "Background Sampling Plan" approach to the determination of "background" concentrations of contaminants may no longer be valid. This approach may need to be revisited in order to evaluate which of the data collected from PA-16 (and PA-18) may be appropriate for use as so-called "background" data.
3. Where specific editorial changes are requested, such as in Comments 9, 10, 11 and 12, below, SFRWQCB staff has no objection to altering margins of the text, or other means, to avoid reproducing the whole text of the document, as a result of potential pagination changes due to incorporation of the requested language.

SPECIFIC

1. p. 7, Section 3.1, Bullet 3: See above, General Comment 2.

2. p. 17, Section 3.6, Paragraph 5: See above, General Comment 2.
3. p. 19, Section 3.6, Paragraph 6: The conclusion that "neither the measured concentrations or distribution of either antimony or arsenic suggest releases from potential sources associated with documented activities at the site" does not necessarily mean that these contaminants will not have to be cleaned up. If the contaminants pose a threat to the environment or to the beneficial uses of the waters of the State, these contaminants will have to be cleaned up.
4. p. 20, Section 3.7, Bullet 10: The background concentrations have not been established at HPA for any metals or organics in soils, sediments or groundwater. The bullet should be modified to reflect that fact.
5. p. 21, Section 3.8, Bullet 4: See above, Specific Comment 3 and General Comment 2.
6. p. 24, Section 4.2, Bullet 5: See above, Specific Comment 3 and General Comment 2.
7. p. 35, Section 4.9.2, Bullet 1: See above, Specific Comment 3 and General Comment 2.
8. pp. 40 and 41, Section 6.3, Bullets 3 and 4: The text refers to shallow aquifer monitoring wells IR18MW21 and IR18MW22, but Plate 7 shows these wells as IR18MW21A and IR18MW22A. Please conform either the text or the Plate and submit corrected pages so that these may be inserted into the document.
9. p. 41, Section 6.4, Sentence 3: Modify to read, "...and the pH, conductivity, temperature and turbidity of the groundwater samples will be measured in the field."
10. p. 44, Section 6.5.3, Insert the following after Sentence 5: "Field measurements of pH, conductivity, temperature and turbidity will be made and recorded for each sample."
11. p. 45, Section 6.5.4, Paragraph 2, Insert the following after Sentence 1: "Field measurements of pH, conductivity, temperature and turbidity will be performed and recorded for each groundwater sample."
12. p. 49, Section 6.8.1, Add a new Sentence 4: "Variances from the proposed workplan will be documented with the 'Notification of Field Variance Form' to be submitted to the regulatory agency designees."

If you have questions or comments, please call me at (510) 464-4222.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara M. Smith".

Barbara M. Smith, Ph.D.
Toxics Cleanup Division

cc: Hunters Point Annex

Commander
Naval Base, San Francisco
Naval Station, Treasure Island
San Francisco, CA 94130-5018

Ms. Louise Lew
Code 1811LL
Western Division
Naval Facilities Engineering Command
P.O. Box 727
San Bruno, CA 94066-0720

Ms. Roberta Blank
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Ms. Bonnie Arthur
Department of Toxic Substances Control
700 Heinz Avenue, Blvd. F, Suite 200
Berkeley, CA 94710

Mr. Michael Buchman
Acting Coastal Resource Coordinator
NOAA/HAZMAT
7600 Sandpoint Way, N. E.
Seattle, WA 98115

Mr. Mike Rugg
California Department of Fish & Game
Region III
P.O. Box 47
Yountville, CA 94599

Mr. William C. Allan
U.S. Department of the Interior
Office of Environmental Project Review
450 Golden Gate Avenue
P.O. Box 36098
San Francisco, CA 94612

Mr. Steve Castleman
San Francisco District Attorney
732 Brannan Street
San Francisco, CA 94103

Mr. David Wells
Bureau of Environmental Health
101 Grove Street, Room 207
San Francisco, CA 94102

Hunters Point Technical Committee Public Member
Attn: Rev. Arelious Walker
950 Gilman Street
San Francisco, CA 94124

Ms. Nancy Wakeman
Bay Conservation and Development Commission
30 Van Ness Avenue
San Francisco, CA 94102

Ms. Catherine S. Fortney
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94106

Mr. Steven Schwartzbach
U.S. Fish & Wildlife Service
Endangered Species Office
2800 Cottage Way, Room E-1803
Sacramento, CA 95825-1846