



ton H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

San Francisco Bay Region

Internet Address: <http://www.swrcb.ca.gov>
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 • FAX (510) 622-2460

N00217.003831
HUNTERS POINT
SSIC NO. 5090.3



Gray Davis
Governor

May 5, 1999
File No. 2169.6032 (DFL)

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402
Attention: Mr. Richard Powell

Re: Regional Water Quality Control Board, San Francisco Bay Region Comments on Draft Final Report of Groundwater Nickel Plume Delineation A-Aquifer, Parcel B, (dated February 1999) and Draft Technical Memorandum, Distribution of the Bay Mud Aquitard and Characterization of the B-aquifer in Parcel B (dated February 18, 1999), Hunters Point Shipyard, San Francisco, California

Dear Mr. Powell:

Thank you for the opportunity to review the above-referenced documents. Comments from the Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) are presented as attachments to this letter.

If you have any questions regarding this letter, please call me at 510-622-2377.

Sincerely,

David F. Leland, P.E.
Groundwater Protection and Waste
Containment Division

Attachment

C:\HuntersPoint\Parcel B\ni&dgapsl.my9

cc: Mr. Chein Kao, DTSC
Ms. Claire Trombadore, USEPA

Regional Water Quality Control Board Comments on Draft Final Report of Groundwater Nickel Plume Delineation A-Aquifer, Parcel B, Hunters Point Shipyard, San Francisco, California (dated February 1999)

1. Section 1.2, second bullet. The Parcel B Record of Decision (ROD) and Remedial Action Monitoring Plan (RAMP) discuss trigger levels for groundwater at the inland boundaries of the tidally influenced zone and the five-year buffer zone, but do not specifically discuss criteria within these zones. With regard to the second bullet in this section, the nickel criterion would apply at the inland edge and upgradient of the five-year buffer zone, not within it. The language of this section and the Executive Summary should be revised to be consistent with the Parcel B ROD.
2. Section 4.0. The discussion offers a number of possibilities to explain the differences between the groundwater samples collected as part of this round and previous sampling results from nearby, now abandoned well locations. What does the Navy see as the relative importance of these different explanations? Which of these are operative and significant for this data set?
3. In light of Comment 1, the conclusions regarding groundwater quality goals do not appear warranted.
4. The Navy should confirm that the stainless steel wells located on the compliance line (Wells IR07MWS-4 and IR07MWS-2) will be replaced with new point of compliance monitoring wells.

Regional Water Quality Control Board (RWQCB) Comments on Draft Technical Memorandum, Distribution of the Bay Mud Aquitard and Characterization of the B-Aquifer in Parcel B, Hunters Point Shipyard, San Francisco, California (dated February 18, 1999)

1. Section 3.2. The report discusses the results of the current investigation but does not put them in the context of previous investigations. The report should include a map or maps showing the distribution, elevation, and thickness of the Bay Mud aquitard. The maps should use all the available data and should integrate these most recent results into the overall data set.
2. Section 3.3. The report discusses the results of the current investigation but does not put them in the context of previous investigations. The report should include a map or maps showing the distribution, elevation, and thickness of the B-aquifer. The maps should use all the available data and should integrate these most recent results into the overall data set.
3. Section 3.5. In discussing the TPH results, the report notes that petroleum hydrocarbons are less dense than water and thus would not tend to migrate vertically. The report should provide additional discussion and justification of the suggestion that water containing dilute solutions of petroleum hydrocarbons will not tend to migrate vertically based on density differences, or provide clarification of the argument if it is not based on density differences.
4. Section 3.5. The report provides no hydraulic head data or groundwater flow information to support the statement that dissolved constituents would not tend to migrate vertically. Are there head differences between the A-aquifer and the B-aquifer? What are the groundwater flow patterns in this area?
5. Section 4.0. The conclusions regarding the copper, zinc, and nickel concentrations are not supported. No demonstration of the statement that contamination would not tend to migrate vertically is provided. The conclusions do not address the possibility of subsurface sources. No maps illustrating the distribution, thickness, and elevation of the Bay Mud using all available data are presented. No explanations for the occurrence of the elevated concentrations are presented or evaluated. Does the Navy suspect some other sources or releases not associated with Navy activity? If so, the data and information that led the Navy to this conclusion should be presented and discussed.