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Gray Davis
Governor

Date: March 23, 2000
File No. 2169.6032 (CRM)

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

Subject: Comments Regarding September 1999 Ground Water Monitoring Report for Parcel B at Hunters Point Shipyard, San Francisco, California

On February 29, 2000 Regional Board staff (Board staff) received the September 1999 Ground Water Monitoring Report (Report) for Parcel B at Hunters Point Shipyard. Board staff discussed the Report with the Base Realignment and Closure Cleanup Team (BCT) during a meeting on March 21, 2000. Per the Navy's request, Board staff is providing the following comments regarding the Report. We understand that the Navy will be scheduling a future time to discuss and resolve the concerns of the agencies.

We are uncertain how the Navy determined that implementation of required notification and re-sampling procedures were unnecessary for total and soluble chromium detected in well IR07MWS-4. The concentration of both total and soluble chromium exceeded the allowable concentration limit of 15.4 mg/L for point of compliance wells. The Report states "*...in both cases where chromium exceeded the trigger level, the detected results were estimated because of potential high bias due to interference from high sample concentrations of calcium and magnesium.*" This rationale certainly does not provide justification for non-compliance with the notification requirements, and likely does not provide adequate rationale for not implementing the re-sampling procedures. We understand that this well was re-sampled during the next scheduled quarterly sampling event. However, simply reporting the data in the quarterly report and then waiting until the next event for re-sampling is inconsistent with the requirements of the Record of Decision (ROD) and Remedial Action Monitoring Plan (RAMP) for Parcel B.

We are uncertain how the Navy intends to address contaminants detected in the ground water where trigger levels have not been established. For example, 4,4 DDT was detected in well IR07MW28A at a concentration of 0.06 µg/L. Several semi-volatile organic constituents were also detected in the ground water for which trigger levels have not been established. Appendix B of the Report provides a comparison of ground water analytical data for each well to the appropriate trigger levels. Board staff believes it would be useful to include some level of analysis for contaminants where trigger levels were not established. We are suggesting that the analysis should include (1) the contaminants detected; (2) the concentrations at which they were detected; (3) the wells at which they were detected; (4) a comparison to any historical ground water quality data for the contaminants and effected wells, including trends and spatial

distribution; and, (5) a comparison to established numerical standards for protection of the assigned beneficial uses.

If you have any questions regarding this matter, please feel free to contact me at (510) 622-2377 or by electronic mail at cm@rb2.swrcb.ca.gov.

Sincerely,



Chris Maxwell
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