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From: Commander, Western Division, Naval Facilities Engineering Command
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Subj: CTO 0248, NAVAL FUEL DEPOT, POINT MOLATE

Encl: (1) Minutes of Phoneconference on 29 December 1993

1. We are forwarding enclosure (1) for your information
2. The point of contact on this matter is Lou Ocampo, Remedial Project Manager at (415) 244-2536.

Original signed by:

MARCELO PASCUA JR.
Head, Installation Restoration Section
Base Closure Team

Distribution:
Gina Kathuria, RWQCB
Bobbie Smith, RWQCB
David West, PRC Denver
Barb DeAgelis, PRC Denver
Bill Desmond, PRC Dallas
Prabhakar Tadepalli, PRC Dallas

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T4A2, T4A2LO
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**NFD POINT MOLATE
CTO 0248 TASK 2 SHORELINE ASSESSMENT
DECEMBER 29, 1993 CONFERENCE CALL WITH PRC AND RWQCB
TELECON MINUTES
PREPARED JANUARY 13, 1994**

Participants:

Gina Kathuria	-	RWQCB
Bobbye Smith	-	RWQCB
Bill Desmond	-	PRC Dallas
Prabhakar Tadepalli	-	PRC Dallas
David West	-	PRC Denver
Barb DeAngelis	-	PRC Denver

- Purpose of telecon presented by David West - CTO 0248 sediment sampling component of Task 2, the Shoreline Assessment including the following:
 - Conference call should focus on concerns of the RWQCB related to PRC's proposed sediment sampling plan under Task 2, and
 - Confirm objectives of the sediment sampling effort
 - Proposal of two-phased or multiple-phased approach to sediment sampling effort
 - Advised that the Navy EIC, Lou Ocampo, was not available, and that decisions resulting from this conference call would require his approval
- Bobbye Smith discussed the Point Molate tidal flats. She and Gina Kathuria visited the site on December 10, 1993 during low tide. Her concern is that the tidal flats are extensive and the proposed sediment sampling locations focus only a short distance (5, 10, and 20 feet) from the shoreline and may not define the extent of contamination. She also stated that the extent of the tidal flats during low tide vary at each stormwater outfall, and some proposed transect locations contain rubble and are not considered tidal flats. The areas of rubble exhibit variations in energy. She advised that the sampling effort needs to be more site specific and sampling locations should be based on visual identification using field screening techniques, to define the lateral and vertical extent of potential contamination. She agreed with PRC that a two-phased approach would be the most viable to develop a comprehensive sampling plan.

Ms. Smith also suggested that PRC and the RWQCB perform a preliminary site visit to visually identify sampling locations and develop a focused field work plan. She stated she would like to visit the site with Dave West and Bill Desmond of PRC. She will also send photographs taken during the December 10 site visit showing the extent of the tidal flats at low tide.

- Dave West agreed with RWQCB regarding a site visit to further develop a sediment sampling strategy, however, questioned using only a visual-based approach to determine sample locations. Mr. West explained that during CTO 0143, four tidal flats sediment samples (SS11-01 to SS11-04) were collected approximately 10 to 15 feet from the shoreline. These sample locations were chosen downgradient of known areas of hydrocarbon contamination. The samples contained no visual evidence of hydrocarbons and no PID readings. However, hydrocarbons were detected in these samples under TPH purgeable and extractable analyses. Up to 2.2 mg/kg gasoline-range hydrocarbons and 280 mg/kg bunker fuel were detected in these samples.
- Bobbye Smith stated that TPH values may be associated with naturally occurring carbon loading associated with seagrass beds. She suggested the use of field screening techniques, including immuno assays, followed by laboratory verification to distinguish natural hydrocarbons versus TPH originating from Point Molate. Field screening methods would also be used to evaluate the extent of hydrocarbons, if present, and to determine appropriate sample locations for more definitive tests.
- Bill Desmond said that the sediment sampling effort should focus on chemical analyses to determine hydrocarbon contamination levels. He has a high level of confidence in chemical analyses; he stated that immuno assays are quick and inexpensive and that more information regarding these types of tests should be obtained.
- PRC and RWQCB discussed the pros and cons of using field screening techniques to expedite the process as opposed to using only laboratory chemical analyses, where resulting data would not be available for 90 days. No consensus was reached.
- Dave West suggested that if hydrocarbon contamination is detected in tidal flats sediment samples collected at distant (over 200 feet from the shoreline) locations, it would be difficult to distinguish contamination originating from NFD Point Molate from potential contamination originating from the Chevron refinery. The refinery has fuel loading piers both north and south of NFD Point Molate.

- Dave West requested that the RWQCB define the objectives of the sediment sampling program. RWQCB had previously suggested the following in a meeting held between the Navy, PRC, and RWQCB on June 14, 1992:

- establish baseline sediment quality
- establish source control measures in the Treatment Ponds Area

Mr. West stated that limited sediment data has already been collected in the Treatment Ponds Area and that source control measures (a 1,800-foot long extraction and cut-off trench) will be implemented in 1994. He questioned the reason for establishing sediment quality downgradient of the trench; however, he agreed that sediment quality data should be established from other areas along the Point Molate shoreline; this additional data may justify additional source control or remedial actions along the shoreline.

- Bobbye Smith stated that a baseline sediment quality survey is necessary to assess Point Molate's impact, if any, to San Francisco Bay. Once baseline quality is established:

- performance criteria for the extraction trench can be demonstrated
- the evaluation of the impact from the stormwater outfalls can be demonstrated
- Bill Desmond suggested that the sediment sampling objectives should be clarified. Three objectives are actually being discussed:

- to establish baseline sediment quality and the impact to San Francisco Bay from hydrocarbon contamination in groundwater
- to assess the impact to San Francisco Bay from stormwater runoff
- to demonstrate improvement (performance criteria) of sediment quality following the installation of the extraction/cutoff trench.

- There was discussion that during the rainy season, residual hydrocarbons present in soil from historical spills and leaks can be flushed as surface water and discharged to San Francisco Bay through stormwater outfalls; this potentially qualifies the stormwater outfall locations for inclusion under the Installation Restoration (IR) program. Dave West stated that the stormwater system has been evaluated by James M. Montgomery under another contract.

Dave West also stated that, with regard to the sediment sampling objectives, establishing performance criteria for the extraction trench would be difficult to meet for the following reasons:

- the trench will be placed as close as possible to the shoreline to intercept migration of known floating hydrocarbons upgradient of the trench in the Treatment Ponds Area.
- the trench will not clean up any existing hydrocarbon contamination downgradient of the trench; this hydrocarbon contamination will be mitigated through natural processes, such as biodegradation.
- The seepage of hydrocarbons into the soil (and groundwater) is a historical problem at Point Molate, related primarily to the former sump pond; PRC's goal is to provide source control to the known problem. In order to demonstrate reductions in TPH concentrations in near-shore sediments, sediment quality would require assessment over an extended time period.
- Dave West also pointed out that the effectiveness of the extraction trench/cutoff wall could more clearly be assessed by observation of floating oil thickness on either side of the trench, or by assessment of groundwater quality on either side of the trench by analyses of groundwater samples.

- Bobbye Smith stated that even if establishment of performance criteria could not be met, the ambient sediment quality should still be evaluated; she stated that this data would be necessary to determine the rate of dispersal or rate of breakdown (biodegradation) of hydrocarbons.

- Dave West asked what approach should be used, taking into consideration the cost constraints of the project. He stated that baseline sediment quality should be established using chemical analyses. This data could then be used as criteria for recommending an ecological risk assessment, and until that phase of the sediment program is met, the collection of bioassay samples (which are currently included in the phased sampling program) is not necessary.
- Bobbye Smith agreed but stated that all options should be kept open.
- Dave West confirmed that establishment of baseline sediment quality is necessary. He suggests that the sampling effort under CTO 0248 should focus on the following:
 - establish baseline sediment quality
 - define the nature and extent of hydrocarbon contamination if any, in the intertidal sediments

Mr. West advised that funds already allocated for bioassays under the current field work plan could be used to expand the baseline sediment survey, if necessary. He stated that changes to the currently anticipated allocations to chemical or biological laboratory analyses is not a problem; however, such changes would require concurrence with the RWQCB and the Navy via a letter.

- Bobbye Smith agreed, stating that the field sampling plan should include as much flexibility as possible. The first phase of the sediment sampling plan should evaluate the chemistry of the sediments (the extent of contamination); if there is contamination present, then the toxicity of the contaminants should be evaluated. If there is no contamination, then further studies are not needed. However, she still thinks a preliminary site visit would be helpful in outlining the sampling plan and stated her interest in participating.
- Bill Desmond stated that the preliminary site visit should focus on the hydrogeologic conditions at the site and selection of sample locations for preliminary data; that is, establishment of the spacial boundaries of the sediment investigation.
- Dave West agreed to a preliminary site visit with Bobbye Smith (RWQCB) and Bill Desmond (PRC-Dallas). He suggests a one- or two-day site visit which will include a visual inspection of the tidal flats (possibly hand augering) and stormwater outfall locations, measurement of the extent of the tidal flats, and evaluation of sediment sampling locations. After this site visit, a field sampling plan addendum would be submitted by PRC with concurrence from all involved parties.
- PRC and RWQCB then discussed scheduling for this site visit. Early February was discussed as the most acceptable time frame for RWQCB and Bill Desmond (PRC-Dallas).
- Bobbye Smith suggested that Dave West call her on January 11, 1994 to confirm a potential date for the site visit.