



November 6, 1995

Mr. Dean Sakakihara
Remedial Project Manager
Engineering Field Activity West
Naval Facilities Engineering Command
900 Commodore Drive, Building 206, Second Floor
San Bruno, California 94066-2402

CLEAN Contract Number N62474-88-D-5086
Contract Task Order (CTO) 0248

Subject: Naval Fuel Depot (NFD) Point Molate National Pollutant Discharge Elimination System (NPDES) Permit Compliance Sampling and Analysis Recommendations

Dear Mr. Sakakihara:

This letter and its attachments summarize PRC Environmental Management, Inc.'s (PRC's) recommendations for NPDES permit compliance sampling and analysis. This letter responds to the California Regional Water Quality Control Board's (RWQCB) September 29, 1995 letter to the Navy requesting the following monitoring information:

- (1) Proposed effluent monitoring that addresses all potential constituents of concern.
- (2) A contingency plan if the treatment plant does not provide for adequate removal of pollutants.
- (3) A proposal for ongoing maintenance of the treatment plant sand filters to ensure proper operation and function.

Attachment A summarizes short- and long-term sampling and analysis recommendations for the existing wastewater treatment plant (WWTP). In addition to the sampling and analyses identified in Attachment A, the Navy will continue to monitor the wastewater treatment plant effluent in accordance with the existing NPDES permit (RWQCB Order No. 95-010). However, oil and grease analysis should be eliminated since the wastewater treatment plant no longer receives municipal wastewater. In addition, biochemical oxygen demand (BOD), total suspended solids (TSS), and total coliform analyses should be reduced from once per day to three times per week since the WWTP no longer receives sanitary sewage treatment plant effluent. (This BOD, TSS, and total coliform sampling frequency [3 times per week] is consistent with the monitoring program in use at the Naval Station Treasure Island WWTP).

Attachment B presents short- and long-term sampling and analysis recommendations for the new groundwater treatment plant, which is scheduled for startup in the summer of 1996.

Mr. Dean Sakakihara

October 25, 1995

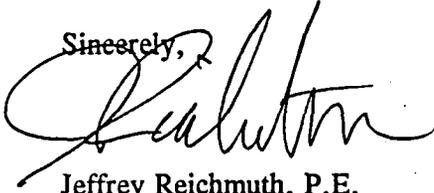
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In the event that the existing wastewater treatment plant does not adequately remove pollutants, the May 8, 1995 contingency plan submitted by the Navy to RWQCB will be followed. If continued NPDES permit compliance problems occur, the Navy will consider temporarily deactivating the groundwater extraction pumps until the new groundwater treatment plant is operating. During this period, groundwater levels in monitoring wells would be measured to determine if groundwater "mounds" occur behind the extraction trench. If groundwater mounding is evident, groundwater extraction pumps may be operated intermittently and groundwater stored in on-site storage tanks.

Sand filters will be operated and maintained following the procedures outlined in the plant Operation and Maintenance (O&M) manual, which has been provided to RWQCB.

Please call me at (303) 312-8883 if you have questions or comments regarding this manner.

Sincerely,



Jeffrey Reichmuth, P.E.

Project Manager

ATTACHMENT A

**NFD POINT MOLATE
EXISTING WASTEWATER TREATMENT SYSTEM
EFFLUENT MONITORING RECOMMENDATIONS**

Period	Parameter	Frequency
Short term (first 3 months of groundwater treatment)	TPH-extractable (C)	1 per week
	PAH (C)	1 per week
	VOC (G)	1 per week
	Total Metals (C)	1 per week
	Bioassays (C)	2 per month
Long term (until new groundwater treatment plant is operating)	TPH-extractable (C)	1 per month
	PAH (C)	1 per month
	VOC (G)	1 per month
	Total Metals (C)	1 per month
	Bioassays (C)	1 per month

Notes:

TPH-extractable	Total petroleum hydrocarbons (diesel, JP5, bunker fuel) - modified U.S. Environmental Protection Agency (EPA) Method 8015
PAH	Polycyclic Aromatic Hydrocarbons; EPA Method 8310
VOC	Volatile organic compounds; EPA Method 8240
Total Metals	EPA Method 6010/7000 series
Bioassays	Conducted per Order 95-010
(C)	Composite sample collected hourly for length of one discharge
(G)	Grab sample

ATTACHMENT B

**NFD POINT MOLATE
NEW GROUNDWATER TREATMENT PLANT
EFFLUENT MONITORING RECOMMENDATIONS**

Period	Parameter	Frequency
Short term (first 3 months of groundwater treatment)	TPH-extractable (C)	1 per week
	PAH (C)	1 per week
	VOC (G)	1 per week
	Total Metals (C)	1 per month
	Bioassays (C)	2 per month
Extended short term (6 months following short term)	TPH-extractable (C)	2 per month
	PAH (C)	2 per month
	VOC (G)	2 per month
	Total Metals (C)	1 per 3 months
	Bioassays (C)	1 per month
Long term (period following extended short term)	TPH-extractable (C)	1 per month
	PAH (C)	1 per 6 months
	VOC (G)	1 per month
	Total Metals (C)	1 per 6 months
	Bioassays (C)	1 per month

Notes:

TPH-extractable	Total petroleum hydrocarbons (diesel, JP5, bunker fuel): modified EPA Method 8015
PAH	Polycyclic Aromatic Hydrocarbons; EPA Method 8310
VOC	Volatile organic compounds; EPA Method 8240
Total Metals	EPA Method 6010/7000 series
Bioassays	Conducted per Order 95-010
(C)	Composite sample collected hourly for length of one discharge
(G)	Grab sample