



December 16, 1996

Cal/EPA

Department of  
Toxic Substances  
Control

10151 Croydon Way  
Suite 3  
Sacramento, CA  
95827-2106

Mr. Larry E. Douchand  
BRAC Environmental Coordinator  
Engineering Field Activities - West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, California 94066

Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

COMMENTS REGARDING THE DRAFT TIME CRITICAL REMOVAL ACTION  
MEMORANDUM, SHORELINE AREAS (IR-04), NOVEMBER 15, 1996,  
POINT MOLATE NAVAL FUEL DEPOT, RICHMOND

Dear Mr. Douchand:

The Department of Toxic Substances Control (DTSC) has completed its review of the subject draft document. Comments regarding this document are provided in the enclosure. These comments provide our insight into the proposed action and provides recommendations to improve the action. The Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) will prepared separate comments on this document. Therefore, the combined comments will be the State's position on this review. Please provide a response to these comments by January 13, 1997 as per the review schedule. DTSC and RWQCB comments should also be addressed in future drafts of this document. The proposed actions are part of the order issued by the RWQCB. RWQCB will be the lead agency for the purpose of addressing the California Environmental Quality Act for this action.



Mr. Larry E. Douchand  
December 16, 1996  
Page Two

If you have any questions regarding this letter, please  
contact me at (916) 255-3591.

Sincerely,



Randy S. Adams, CEG  
Hazardous Substances Engineering  
Geologist  
Office of Military Facilities

Enclosures

cc: Mr. James Nusrala  
Regional Water Quality Control Board  
San Francisco Bay Region  
2101 Webster Street, Suite 500  
Oakland, California 94612

Mr. Phillip Ramsey  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105

## ATTACHMENT

DEPARTMENT OF TOXIC SUBSTANCES CONTROL'S  
COMMENTS  
REGARDING THE  
DRAFT TIME CRITICAL REMOVAL ACTION MEMORANDUM  
SHORELINE AREAS (IR-04)  
NOVEMBER 15, 1996  
POINT MOLATE NAVAL FUEL DEPOT, RICHMOND

### General Comments

The Removal Action Memorandum does not adequately address the concept of a containment wall in the area of the Drum Lot No. 1. Department of Toxic Substance Control (DTSC) recommends including several conceptual drawings including cross-sections along the alignment of the proposed containment wall describing the geology of the site and the placement of steel sheet piling. Based on interpretation of groundwater data from September and December 1994, DTSC believes the proposed length of the containment wall as shown on figure 2-3 will not contain all the groundwater contamination in the area of Monitoring Well MW-11-57, Piezometer PZ11-73, PZ11-76, and Soil Boring SB11-58. SB11-58 is not shown on figure 2-3 and should be included. DTSC recommends that the containment wall be extended to capture groundwater contamination in the vicinity of PZ11-76 and MW11-58.

Performance monitoring wells or piezometers down gradient of the containment wall have not been included in this proposal. In the interim, following completion of the containment wall, extraction wells up gradient of the containment wall can be monitored for salt water intrusion when operation begins. The presence or absence of salt water in extraction wells will be an indication of the containment Wall performance.

### Section 2.2.2.4 Groundwater Sampling Results

Groundwater sampling results for October 1996 are discussed in this section. Tables 2-1 through 2-7 summarize this data. DTSC notes that contaminants found in wells where groundwater will be contained by the containment all are also found at well

locations where a containment wall is not proposed (See Drum Lot No. 1 Data). Groundwater data from September and December 1994 support this finding. The December 1994 groundwater data shows higher concentration of contaminants in wells in this vicinity. This suggests seasonal variation most likely due to rain fall. DTSC recommends that the September and December 1994 groundwater data be included in this document.

An evaluation of groundwater data for September and December 1994 and October 1996 by California Department of Fish and Game finds that the concentration of contaminants in groundwater in wells outside the proposed containment wall of Drum Lot No. 1 may pose an environmental risk to the ecological habitat of San Pablo Bay.

#### **Section 2.3.1 Potential for Continued State and Local Response**

Change the last sentence of the first paragraph to read, *"The Regional Water Quality Control Board, San Francisco Bay Region, will be the lead agency for the purpose of addressing the California Environmental Quality Act for this action"*.

MEMORANDUM

To: Randy Adams  
Office of Military Facilities  
Department of Toxic Substances Control  
10151 Croydon Way, Suite 3  
Sacramento, CA 95827-2106

December 12, 1996

From: Department of Fish and Game - Environmental Services Division

Subject: Review of Point Molate Groundwater and Soil Data  
(5920/60150/NTX044)

The Department of Fish and Game has reviewed the soil, sediment and groundwater data provided for Naval Fuel Depot Point Molate. You have asked us to determine whether the Navy's proposed action to build a cut-off wall will provide protection for fish and wildlife resources.

In our view, the Navy must complete the entire extension of the cut-off wall to isolate San Pablo Bay from the source of contaminated groundwater. This action will ensure the best possible protection for natural resources in the Bay. San Pablo Bay is habitat for many important aquatic species. Listed below are some special status species which may occur adjacent to Point Molate.

- Winter-run chinook salmon (*Oncorhynchus tshawytscha*) - state endangered
- California least tern (*Sterna antillarum browni*) - state and federal endangered
- Western snowy plover (*Charadrius alexandrinus nivosus*) - federal threatened
- American peregrine falcon (*Falco peregrinus anatum*) - state and federal endangered.

In addition to special status species, the Department has jurisdiction over the conservation, protection and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. In that role, we are concerned with minimizing impacts to all native species in San Pablo Bay. This responsibility extends to special habitats such as the eel grass beds adjacent to Point Molate.

While specific clean-up levels are not available for many of the contaminants found in the groundwater, soil and sediment at Point Molate, a groundwater cleanup standard has been developed for Total Petroleum Hydrocarbons Diesel Range (TPH-d). A clean-up standard of 200ug/l has been set to provide ecological protection at the San Francisco International Airport. This number is based upon Sea Urchin Elutriate Bioassays. The plume adjacent to San Pablo Bay immediately north of the pier shows concentrations of bunker fuel in the groundwater as high as 16,000 ug/l. This level is unacceptable, and installation of the cut-off wall would provide protection to natural resources while making clean-up feasible.

Other contaminants in the area are hard to analyze due to the large number on nondetects and estimated levels shown in the data. It is possible that some of these contaminants are also being released at levels harmful to fish and wildlife resources.

Thank you for the opportunity to comment on this project. If you have any further questions regarding this or other issues at Point Molate, please contact me at (916)489-7833.



Susan R. Ellis  
Senior Biologist

cc. Environmental Services Division  
Pete Phillips