



April 1, 1997

Department of
Toxic Substances
Control

700 Heinz Avenue
Suite 200
Berkeley, CA
94710-2737

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Izzat Ahmadiyya
Code 1842
900 Commodore Drive
San Bruno, CA 94066-2402

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

**NAVY'S RESPONSE TO AGENCY COMMENTS ON DRAFT TIME-
CRITICAL REMOVAL ACTION MEMORANDUM, NFD POINT MOLATE,
CA**

Dear Mr. Ahmadiyya:

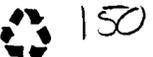
The Department of Toxic Substances Control (Department) and San Francisco Bay Regional Water Quality Control Board (Regional Board) have reviewed the subject document.

The Department and Regional Board find that the Navy's responses do not adequately address our comments, nor do they indicate that the Navy intends to meet the terms of the Regional Board's Order 95-235, which requires hydraulic containment of contaminated groundwater beyond the capture zone of the existing trench and the trench extension by December, 1997 (Task 8c). The position of the State is that extending the trench wall (sheet pile wall) beyond MW11-54 (i.e., beyond the southern terminous of the proposed main wall) offers the means most likely to accomplish such containment within the timeframe specified in the Order.

Comments from the Regional Board are attached. If you have any questions regarding this letter, please contact me at (510) 540-3925.

Sincerely,

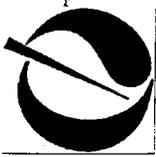
Mary Rose Cassa, R.G.
Hazardous Substances
Engineering Geologist



Mr. Izzat Ahmadiyya
April 1, 1997
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cc: Mr. James Nusrala
San Francisco Bay
Regional Water Quality Control Board
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Oakland, CA 94612

Mr. Phillip Ramsey (H-9-2)
U. S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105



EPA

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March 24, 1997

File No. 2119.1057 (JN) Pete Wilson
Governor

Ms. Mary Rose Cassa
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

**Subject: Agency Comments on Draft Time-Critical Removal Action Memorandum,
Shoreline Areas (IR-04), Naval Fuel Depot Point Molate**

Dear Ms. Cassa:

Regional Water Quality Control Board (RWQCB) Staff have reviewed the Navy's response to agency comments on the action memorandum mentioned above. Staff feels that the Navy's response does not adequately address both our general and specific concerns on the Navy's proposed field work at the shoreline of Point Molate. The following outstanding issues related to our initial comments remain.

1. The Site Cleanup Requirements for Point Molate (Regional Board Order 95-235) Task 8c requires that the Navy document implementation of the preferred corrective action for hydraulic containment of contaminated groundwater beyond the capture zone of the existing extraction trench and trench extension by December 1, 1997. The 1994 groundwater monitoring reports show that up to 10,000 micrograms per liter (ug/l) total extractable petroleum hydrocarbons were detected in monitoring wells MW 11-57 and PZ 11-76, which are at least 600 feet south of the proposed ending of the extraction trench near well MW 11-54. Additionally, the pump tests run by the Navy's contractor in the fall of 1996 showed a marked increase in salinity in both the pumping and observation wells for well MW 11-57. This information proves that hydraulic pumping from wells in the vicinity of the drum lot is not feasible without a cutoff wall. Staff believe that the most effective way for the Navy to provide for hydraulic containment of this contaminated groundwater in the drum lot is to extend the proposed trench extension design from MW 11-54 to the fuel pier according to the schedule laid out in the Order.

2. In the absence of screening levels for total petroleum hydrocarbons as diesel and bunker fuel (TPH) in the drum lot area shoreline, RWQCB staff collected groundwater samples at two well locations and conducted chemistry and toxicity tests on the water. The two well locations were MW 11-19 and MW 11-57. We have since shared this data with the Navy. The results from the mysisidopsis bahia chronic bioassay test have led us to conclude that a TPH water quality goal of between 475 and 663 micrograms per liter (ug/l) would be protective of aquatic life at the sediment water interface.

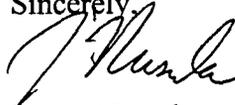
3. RWQCB staff dispute the Navy stating in their response to our comments on the action memorandum that the RWQCB agreed that the scope of the removal action was only to contain free floating product at the August 27, 1996 and October 22, 1996 Remedial Project Managers meetings. Both my notes of these two meetings and the Navy's official meeting minutes say nothing to this effect. The following is in the Navy's minutes of the August 27 meeting: "The Navy's removal action objectives include containing floating fuel south of the existing trench, containing and extracting contaminated groundwater 'hot spots,' and minimizing future final action requirements,

and implementing an action that is compatible with the final remedial action.”
Furthermore at approximately this same time frame , the BRAC Cleanup Team approved of the Navy conducting pump tests, which are done to determine the feasibility of extracting site groundwater. RWQCB staff take strong offense to the Navy mischaracterizing the BRAC Cleanup Team’s opinion at monthly meetings.

4. The Navy’s response to our Comment #1 requesting that the Navy reference in this action memorandum sediment data at Transect 8 from earlier investigations, is unacceptable. The Navy should provide pertinent sediment chemistry data offshore from the drum lot so that the reader can better evaluate the ecological threat of shoreline groundwater at Point Molate moving toward the Bay.

If you have any questions on this matter, please contact me at (510) 286-0301.

Sincerely,



James Nusrala
Project Manager