

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
700 HEINEZ AVE., SUITE 200
BERKELEY, CA 94710

N60028_000037
TREASURE ISLAND
SSIC NO. 5090.3.A



September 4, 1991

Commanding Officer
Western Division
Attn: Mr. Ernesto Galang, Code 1813
Naval Facilities Engineering Command
P.O. Box 727
San Bruno, California 94066-0720

Dear Mr. Galang:

**STATE'S COMMENTS ON THE DRAFT FINAL WORKPLAN AND DRAFT FINAL
FIELD SAMPLING, TREASURE ISLAND, CALIFORNIA**

On July 19, 1991, the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (Water Board) (DTSC) received a copy of the Draft Final Workplan (Workplan) and Draft Final Field Sampling Plan (FSP) for Naval Station Treasure Island (TI). Both DTSC and the Water Board completed their review of the reports. Enclosed you will find regulatory agencies' comments to the reports. Please ensure that these comments are addressed when revising the reports and during the implementation of the Remedial Investigation.

You may call me at (510) 540-3815 if you have questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Romy F. Fuentes".

Romy F. Fuentes
Waste Management Engineer
Site Mitigation Branch
Region 2

Enclosures
cc: See next page

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D/N 7

Mr. Ernesto Galang
September 4, 1991
Page Two

cc: Commanding Officer
Building One, Code 82.2
Attn.: Mr. Eddie Sarmiento
Staff Civil Engineers Office
NAVSTA Treasure Island
San Francisco, California 94103

Mr. Tom Gandesbery
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

ADMIN RECORD

DTSC COMMENTS ON DRAFT FINALS WORKPLAN AND FIELD SAMPLING PLAN
TREASURE ISLAND NAVAL STATION

GENERAL COMMENT:

The general contents of the reports strictly adhere to the workplan and sampling plan elements presented by U.S Environmental Protection Agency (EPA) in its Guidance for Conducting Remedial Investigation and Feasibility Studies Under CERCLA (OSWER Directive 9355.3-01). DTSC finds this as the major strength of the reports in addition to the clarity and brevity of the text.

In the development of the Workplans and Field Sampling Plans for the Fire Training Area, New Fuel Farm and Auto Hobby Shop, previous investigations should have been considered and discussed. The workplan and sampling plan for these three sites should have some bearings on the previous findings. If the Navy have questions about the validity of previous findings on these three sites, please discuss them in the revised Workplan and Field Sampling Plan.

With regards to the proposed geophysical investigations, the Field Sampling Plan did not contain enough information to enable a detailed review. The Field Sampling Plan mentions that the geophysical work will be performed by a subcontractor who has not been hired and (presumably) has not contributed to this sampling plan. DTSC recommends that the Navy and its contractor enlist the services of the yet-to-be-named subcontractor in revising this plan. In this manner, the contractor may be better able to address the comments and recommendations presented here.

SPECIFIC COMMENTS:

Draft Final Workplan

1. Page iv, List of Acronyms. "Maximum Containment Levels" should be changed to "Maximum Contaminant Levels."
2. Page 26, section 3.2.11 (Site 12). DTSC requests the Navy to submit a copy of the Preliminary Risk Assessment Report (PRC, 1991 b) that was written for the Old Bunker Area.
3. Page 30, last paragraph of the page and Sample Analysis Summary Tables. QA/QC lab results, for trip blanks, field & equipment blanks, duplicates, and spikes should accompany field sampling results data to verify data validation and any claims of anomalies or lab errors.
4. Pages 40-45. The agency, "Department of Health Services (DHS)" mentioned in the text should be renamed to the "Department of Toxic Substances Control (DTSC)."
5. Page 40, State of California ARARs. Attached are additional State ARARs that should be considered for Naval Station, Treasure Island.

6. Page 51, section 4.1.1.3, Extent of Contamination. Bullet items should include air sampling as one of the techniques to further analyze the extent of contamination.
7. Page 52, section 4.1.2.1, Identification of Site Contaminants of Concern. For almost thirty years, munitions bunkers and cell-type disposal units were located at site 12. It is conceivable that unwanted explosives may have been disposed of in the disposal units. At a minimum, please include the following explosives in the target chemicals for site 12: HDX, RDX; lead azide; 2,4,6-trinitrotoluene; 2,6-dinitrotoluene; 2,4-dinitrotoluene; diphenylamine; and phosphorus based explosives.
8. Page 59, section 5.2, Community Relations Plan (CRP). A copy of the CRP should be sent to DTSC for review and comment.
9. Page 60, section 5.3.5, Fire Training School. Please explain what will happen to the existing buildings within the Fire Training Area. DTSC was recently informed that these buildings are scheduled for demolition. Building and structures should be decontaminated prior to demolition. Guide for Decontaminating Buildings, Structures, and Equipment at Superfund Sites (EPA/600/2-85/028) should be used as a guidance document.
10. Page 61, section 5.3.5, Fire Training School Area (FTSA), first paragraph of the page. Previous studies were already conducted at the FTSA. The workplan should be revised to include specific locations and analytical parameters based on these previous investigations in addition to the preliminary survey of this workplan. State reasons why these previous investigations were ignored in the preparation of this workplan.
11. Page 62, section 5.3.10, YBI Landfill. Asbestos may have been disposed of in this landfill. Air monitoring for asbestos should be conducted during field activities at the landfill.
12. Page 63, section 5.3.12, Stormwater Outfalls. Sediment samples should also be analyzed for cyanide. Sediment samples that were taken for the proposed dredging operation at Pier 1 on Treasure Island indicated cyanide in sediments.
13. Page 62, section 5.3.11, Old Bunker Area. Please see comment number 7 on previous page.
14. Page 64, section 5.3.15, Clipper Cove Tank Farm. Samples should also be analyzed for volatile organics (VOCs) and semi-VOCs to confirm previous findings.

Field Sampling Plan

1. Page 4, section 4.2.1, Ground Penetrating Radar.

The selection of antenna frequency is not discussed. Antenna selection is an important aspect of GPR surveys, since the depth of investigation is dependent on both site geology and radar frequency. The antenna frequency or frequencies proposed for use at TI should be specified in the sampling plan.

2. Pages 5-6, section 4.2.2, Electromagnetic Induction (EM).

a) This section states that EM will be used to map contaminant plumes. Plume mapping with EM is extremely difficult to perform and usually requires either homogeneous stratigraphy or repeated measurements over time, neither of which exists at TI. EM would be of better use for locating the lateral extent of waste trenches and landfills (the more common use of EM). This issue should be clarified in the revised plan.

b) A comment is made that surface plots will be generated along with contour maps. Surface plots of geophysical data are generally of little use.

c) The report states that unwanted noise will be filtered out. Without understanding what noise and what is true signal, filtering has little chance of success. Even if noise sources are known, filtering may not succeed, especially if the noise and the signal have comparable frequencies. Noise assessment should be discussed in the plan and the limitation of filtering should be acknowledged.

3. Page 6, section 4.2.3, Magnetometry.

a) This section states that a magnetometer will be used "were appropriate." More details should be provided; either name the sites where it will be used or define the criteria that would make magnetometry useful at a particular site.

b) It also stated in the report that magnetic data "will be first interpreted qualitatively." Quantitative interpretation of magnetometric data is difficult for geology alone--for hazardous waste investigations, it is virtually impossible (there are special cases where quantitative interpretation is possible, but they do not exist at Treasure Island). DTSC recommends that the Navy proceed no further than a qualitative interpretation.

c) Filtering and surface plots are proposed in this section along the same lines as for the EM investigation. Comments b and c for EM also apply here. Surface plots should not be presented and noise

assessment and limitations of filtering should be discussed.

4. Page 7, section 4.3.1, Soil Boring and Sampling- Power Equipment.

The last paragraph of the page does not specify the type of UV light source for Photo Ionization Detector (PID). PID containing 11.7 electron volts (ev) UV lamp source will ensure the greatest range of volatile species.

A Flame Ionization Detector (FID), such as an Organic Vapor Analyzer (OVA) should also be used to detect species having ionization potential up to 15 ev during field screening of samples.

5. Page 8, last paragraph of section 4.3.1.

DTSC ruling on drums containing drill cuttings and well development water is as follows: drums should be labelled as "Drill Cuttings, Pending lab Analysis." The date when storage started should be also indicated on the drums. Prior to obtaining hazardous waste characterization lab results, the drums and their contents should be handled conservatively as if they were tested as hazardous. This means that the 90-day storage limit applies. A 30-day extension should be requested from DTSC Facility Permit Branch if lab results are not available prior to the end of the 90-day storage limit.

6. Page 8, section 4.3.2 Soil Boring and Sampling - Hand Equipment.

Instead of using a hand auger, a hand operated core sampler (with 6" long and 2.0" dia. brass sleeve) should be used at locations that can not be accessed by power equipment. A core sampler will reduce disturbance in the soil, particularly for purposes of soil logging and sampling for volatile species.

7. Page 23, section 5.2, PCB Equipment Storage Area.

Two additional soil borings should be added to characterize all three stained areas as shown in figure 8 of the field sampling report.

8. Page 24, Old Boiler Plant.

Metals and waste acids should be analyzed in samples that will be taken from test pits and soil borings. The Handbook of Industrial Waste Compositions in California includes metals and waste acids as waste products during boiler cleaning operations and on-site

waste disposal, which may have happened during the plant's active service.

9. Page 24, section 5.5, Fire Training School.

Please see workplan comment number 10.

10. Page 25, Pesticide Storage Area.

Please explain why pesticide storage and disposal were limited to organochlorine pesticides and chlorinated herbicides. Organophosphorus (EPA Method 8140) and carbamates (EPA Method 632) may have been also stored and disposed of on the surrounding area of this site.

11. Page 27, Old Bunker Area.

Please see workplan comment number 7.

12. Page 27, Stormwater Outfalls (Site 13/13A)

Please see workplan comment number 12.

13. Page 29, Clipper Cove Tank Farm.

Please see workplan comment number 14.

14. Page 30, Auto Hobby Shop and Transportation Center.

In December 1990, DTSC, the Water Board and WESTDIV observed soil that was stockpiled in a fenced area by the Auto Hobby Shop. Evidently, soil was excavated from the hobby shop's yard in order to pull out a leaking underground storage tank (UST). The excavated soil surrounding the UST was contaminated with fuel. Please discuss what happened to the excavated soil and to the excavated area. Also, explain rationale why this previous investigation was ignored in the development of the sampling plan for this site.

15. Table 3, Sample Criteria for Soil and Water Samples.

The holding time for pesticides is 7 days (from sample collection) to extraction analysis and 40 days after extraction.

16. Figures 11, 22, 25, and 27.

The blow-up maps (maps inside circles) show systems of rectangular grids. Please explain the purpose of the grids in the text.

STATE OF CALIFORNIA
 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

Chemical Specific	Citation	Description
Air Resources Act	H&S Code, Div. 26 3900 et seq.	Regulates both nonvehicular and vehicular sources of air contaminants in California. Defines relationship of the California Air Resource Board (ARB) and local regional air pollution control districts (APCD). Establishes Ambient Air Quality Standards. Establishes permit procedures.
Mulford-Carrett Air Resources Act	H&S Code, Div. 26, Sec. 39000-44563, CAC Title 17, Part 111	Establishes Ambient Air Quality Standards. Regulates both vehicular and nonvehicular sources of air contaminants in California. Section 93000 also identifies benzene and hexavalent chromium as toxic air contaminants. However, no threshold values have been determined.
California Safe Drinking Water Act	H&S Code, Div. 5, Part 1, Chapter 7, Sec. 4010 et seq.	Regulations governing public water systems. Drinking Water Quality standards - Maximum Contaminant Levels (SMCLs). Requirements for water quality analysis and Laboratories.
Porter Cologne Water Quality Control Act	Water Code, Div. 7, Sec. 13000 et seq.	Establishes authority of the State and Regional Water Boards to protect water quality by regulating waste disposal and by requiring cleanup of hazardous conditions.
Santa Ana Regional Water Quality Control Board		Allowable treated water emissions are determined based on DHS action levels and best available technology (BAT).
Santa Ana Regional Water Quality Control Board	Water Quality Control Plan, Santa Ana River Basin	The objective of this plan is to show how the quality of surface and groundwater in the Santa Ana Region can be controlled to provide maximum benefit.
	Water Quality Objectives	Promulgated criteria setting chemical specific concentration levels for a variety of uses of specific bodies of water. Based on the beneficial uses of specific water bodies.
Central Valley RWQCB Designated Level of Methodology for Waste Classification and Cleanup Level Determination		This guidance document is in the tentative stage of development for use in the classification and subsequent disposal method of both hazardous and non-hazardous wastes.
Hazardous Waste Control Act	H&S Code, Div. 20 Chapter 6.5, Sec 25100 et seq.	Regulations governing hazardous waste control; management and control of hazardous waste facilities; classification of extremely hazardous, and non-hazardous waste.
Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes	CAC, Title 22, Chapter 30	As administered by the Department of Health Services, Section 66300 of Chapter 30 provides no RCRA-type exemption for CERCLA sites.
Criteria for Identifying Hazardous Waste	Title 22, Article 11, Sec 66693-66746	Tests for identifying hazardous characteristics are described in these Sections. If a chemical is either listed or tested and found hazardous, then it must comply with the hazardous waste requirements under Title 22.

Persistent and Bioaccumulative Toxic Substances	Title 22, Sec. 66699	Total Threshold Limit Concentrations (TTLCs) and Soluble Threshold Limit Concentrations (STLCs) have been established of selected toxics to be used in establishing whether waste is hazardous. If a chemical is either listed or tested and found hazardous, then it must comply with the hazardous waste requirements under Title 22.
Safe Drinking Water and Toxic Enforcement Act	H&S Code, Div. 20 Chapter 6.6 Sec. 25249.5 seq.	Prohibition on contaminating drinking water with specific carcinogens and reproductive toxics.
Fish and Game Regulations on Pollution	Fish and Game Code, Div. 6, Part 1, Chapter 2, Sec. 5650 et seq.	Codifies the prohibition of water pollution with any substance or material deleterious to fish, plant or bird life.
Water Quality Objectives	RWQCB Criteria	Promulgated criteria setting chemical specific concentration levels for a variety of uses of specific bodies of water. Based on the beneficial uses of specific water bodies.
State Action Levels	DHS Criteria	Criteria setting chemical specific concentration levels. Numerical limits are designed to protect human health from chemical constituents in drinking water. Recommended acceptable limits.
Hazardous Waste Control Act	H&S Code, Sec. 25100-25395, CAC Title 22, Chapter 30	Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes. The HWCA has many elements that are intended to control hazardous wastes from their point of generation through accumulation, transportatio, treatment, storage, and ultimate disposal.
Actions Specific		
CA "Super Fund" Law - Hazardous Substances Account Act/Hazardous Substances Cleanup Bond Act	H&S Code, Div. 20, Chapter 6.8, 25300 et seq.	Establishes state authority to clean up hazardous substance release and compensate persons injured by exposure to hazardous substances. Created a \$100 million Hazardous Substances Cleanup fund to supplement the hazardous Substances Account.
Toxic Pits Cleanup Act	H&S Code, Div. 5, 6300 et seq.	Regulates the closure of surface impoundments containing hazardous waste.
Occupational Health and Safety Act	Labor Code, Div. 5, Sec. 6300 et seq.	Regulations to assure safe and healthy working conditions by authorizing the enforcement of standards and procedures.
Undergrounds Storage of Hazardous Substances Requirements	H&S Code, Div. 20, Chapter 6.7, Sec. 25280 et seq.	Regulations governing the testing, monitoring and replacing underground storage tanks.
Location - Specific		
Hazardous Waste Control Act	H&S Code 251000-25395, CA Title 22, Chapter 2-30	Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes. Regulations governing surface impoundments, waste piles, landfills, and land treatment facilities.
Porter-Cologne Water Quality Act	Water Code 13000-13806 CAC Title 23 Subchapter 15, 1050-2836	CAC Title 23, Article 3 provides guidelines for Waste Management Unit Classification and Siting Article 3 states that new waste management units shall have a 200-foot setback from any known Holocene earthquake fault (55331(d), 5532(d), 5533(d)).

Class I and II units should not be located where porous soil could impair the ability of natural geologic materials to act as a barrier to vertical fluid movement (253(b)(1), 2532(b)(1)).

Requirements for Generators of Hazardous Wastes	Title 22, Sec. 66470-99515	Requires that "an owner or operator who initiates a shipment of hazardous waste from a Transport, Storage, or Disposal (TSD) facility shall comply with the generator standards established under Article 6, Title 22 of the CAC. These standards include keeping manifests, submission of manifests to DHS within 30 days of shipment, preparation of a biennial report, and maximum 90 day accumulation time.
General Operation Requirements for Interim Status and Permitted Facilities	Title 22, 67100-67195	Describes requirements for general facility standards, preparedness and prevention, contingency plan and emergency procedures, manifest system, and environmental monitoring.
Closure and Postclosure of Interim Status and Permitted Facilities	Title 22, 67250-67262	Requires that the facility shall be closed in a manner that minimizes the need for further maintenance, and controls, minimizes, or eliminates postclosure escape of hazardous waste decomposition products to the ground or surface waters or the atmosphere. Where hazardous waste will remain after closure, postclosure care must continue for 30 years.
Tanks at interim Status and Permitted Facilities	Title 22, 67250-67262	Requires tank systems to meet design standards and provide for: containment and detection/monitoring of leaks, monitoring and inspection and proper closure procedures.
Land Disposal		
Surface Impoundments	Title 22, 67280-67318	Requires the owner or operator of a surface impoundment to install 2 liners and a leachate collection system. Monitoring/Inspection, Emergency/Contingency Plans, and Closure/Postclosure care must be provided.
Waste Piles	Title 22, 67340-67351	Provides for the same general requirements as surface impoundments. Construction of new or replacement landfill units onsite requires a liner of acceptable material strength and engineering design, a leachate collection system immediately above the liner, monitoring and inspection, and closure/postclosure care.
Land Treatment	Title 22, 67360-67382	Hazardous constituents shall be degraded, immobilized, or transferred within the treatment zone, treatment must be demonstrated, design criteria must be met, and unsaturated soil zone must be established.
Incineration	Title 22, 67450-67468	Requires that the waste feed analyzed for constituents listed in the permit is within the limits of the permits. Where a permit is not required, the contents of such a permit should be estimated. Requires performance standards and monitoring of various parameters during operation of the incinerator. At closure, requires the owner or operator to remove all hazardous waste and hazardous waste residues.

Hazardous Waste Hauler Registration	Title 22, 66420-66465 and 66530-66564	Hazardous waste must be transported by a hauler registered by the state. Applicable to redispasal of waste Applicable to redispasal of waste as well as disposal of incineration ash if these materials are hazardous.
South Coast Air Quality Management District Rules and Regulation	Regulation IV	Prohibitory Rules
	Rule 401	Visible emission. Limits visible emissions form any point source.
	Rule 402	Nuisance. Prohibits the discharge of any material (including odorous compounds) that causes injury, or annoyance to the public, property, or business or endangers human health, comfort, repose or safety.
	Rule 403	Fugitive Dust. Limits onsite activities so that the concentration of fugitive dust at the property line shall not be visible and the downwind particulate concentration shall not be more than 100 micrograms per cubic meter, averaged over 5 hours, above the upwind particulate concentration.
	Rule 404	Particulate Matter (Concentration). Rule 404 (1) limits particulate emission to a range of 0.010 to 0.196 grain per standard cubic foot averaged over 1 hour for a volumetric gas flow rate of 7000 cu. m/hr or 23 cu.m/hr, respectively.
	Rule 407	Liquid and Gaseous Air Contaminants limits carbon monoxide emissions to 2,000 ppm and sulfur dioxide emission to 500 ppm averaged over 15 minutes.
	Rule 409	Combustion Contaminants. Limits the emission of particulate matter from a combustion source.
	Rule 473	Disposal of Solid and Liquid Wastes. Incineration design to dispose of combustible refuse at burning rates greater than 50 kilograms per hour shall not release particulate matter in excess of 0.23 grams per cubic meter of gas calculated to 12 percent of carbon dioxide.
	Rule 474	Fuel Burning Equipment Oxides of Nitrogen. Limits the concentration of oxides of nitrogen (as NO3) to a range of 125 to 300 ppm for gaseous fuels depending on the size.
Standards of Performance for New Stationary Sources	Regulation IX	Implements the provisions of Part 60, Chapter 1, Title 40, of the CFR under the supervision of SCAQMD Executive Officer.
National Emission Standards for Hazardous Waste Air Pollutants	Regulation IX	Implements the provisions of Part 60, Chapter 1, Title 40, of the CFR under the supervision of SCAQMD Executive Officer., if contaminants are listed.
Source Specific Standards	Regulation IX	Rule 1150 - " Executive of Landfill Sites " states that no person shall initiate excavation of an active or inactive landfill without an Excavation Management Plan approved by the SCAQMD. The plan shall provide information regarding the quantity and characteristics of the material to be excavated and transported and shall identify mitigation measures including gas collection and disposal, bailing, encapsulation, covering of the material, and chemical neutralizing.

New Source Review	Regulation XIII	This regulations sets forth the preconstruction review requirements for new or modified stationary sources, to ensure that the operation of such stationery sources does not interfere with the progress in attainment of the national air quality standards, without unnecessarily restricting the future economic growth within the district.
	Proposed Rule 223	This proposed rule specifies the method to determine the impacts of emissions from new stationary sources and modifications to existing stationary sources. The provisions of this rule shall apply to preconstruction review of sources that emit carcinogenic air contaminants such as benzene.
	Rule 1166	This rule limits the emission of VOCs from soil contaminated with VOCs as a result of leakage from storage or transfer facilities from accidental spills, or other deposition.
Hazardous Waste Movement Committee Memorandum of Understanding	An agreement made on November 8, 1983 by the DHS, Caltrans, and the CHP.	An agreement between the Department of Health Services, Transportation (Caltrans), and the California Highway Patrol (CHP) to coordinate with each other for the transportation of large quantities of hazardous wastes excavated from abandoned sites.
State of California Department of Water Resources	Water Well Standards, Bulletin 74-81, 1989 or Draft 1990	This document sets standards to be applied to the construction or destruction of water wells throughout the State of California
California Environmental Quality Act	California Public Resources Code, 21100 et seq.	Requires either Environmental Impact Reports or Negative Declarations for cleanups, Interim Remedial Measures, and occasionally, parts of some Remedial Investigations and Feasibility Studies.

CALIFORNIA STANDARDS, REQUIREMENTS, CRITERIA AND LIMITATIONS FOR HAZARDOUS WASTE CLEANUPS PURSUANT TO SECTION 121 (d) (2) OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT. SEPTEMBER, 1987

I. STATUTES AND REGULATIONS

STATUTES	REGULATION	APPLICABILITY	REGULATORY AGENCY
Air Resources Act Health and Safety Code, Division 26, Section 39000 et seq.	17 CAC, Part III, Chapter 1 Section 6000 et seq,	Air Quality (Refer also to air district requirements in Section II)	Air Resources Board
California Coastal Act of 1976 Public Resources Code, Division 20 Section 30,000 et seq.		Activities in Coastal Zone Coastal Management Program	California Coastal Commission
California Environmental Quality Act, Public Resources Code Division 13, Section 21000 et seq.	14 CAC, Division 6, Chapter 3 Section 15000 et seq.	CEQA Law and Guidelines. EIR process and alter- natives.	Resources Agency Office of Planning and Research
California Health and Safety Code Div. 20	California Administrative Code, Title 22, Division 4 Chapter 30, Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes.		Department of Health Services
Chapter 6.5 Hazardous Waste Wastes.		Management and Control of TSD facilities, Transpor- tation, Hauling, Labora- tories, Fees, Waste Classi- fication.	Department of Health Services
Chapter 6.6 Safe Drinking Water and Toxics Enforcement Act (Proposition 65)		Reproductive Toxin Levels Reporting of hazardous materials releases to local government	Department of Health Services

STATUTES	REGULATION	APPLICABILITY	REGULATORY AGENCY
Chapter 6.7 Underground Storage of Hazardous Substances		Underground tank construction and containment	Department of Health Services State Water Resources Control Board Regional Water Quality Control Board
Chapter 6.8 Hazardous Substance Account		Principle requirement governing State Superfund and Board program abandoned sites, emergency response, victim's compensation	Department of Health Services
Chapter 6.91 Hazardous Materials Duty		Notification to local government officials of the use of the use of and dangers imposed by hazardous materials. Community information program	Office of Emergency Services
Chapter 6.95 Hazardous Materials Release Response Plans and Inventory	19 CAC, Chapter 3, Subchapter 3	Emergency plans in the event of hazardous materials release or threatned release	Office of Emergency Services
Chapter 6.98 Environmental Quality Assessment		Registration of Environmental Assessors	Department of Health Services State Water Resources Control Board Air Resources Board
California Safe Drinking Water Act, Health and Safety Code, Division 7, Part 1, Chapter 7 Section 4010 et seq.	California Administrative Code, Title 22, Division 4, Chapter 15, Domestic Water Quality and Monitoring	Public Water Systems Drinking Water Standards Maximum Contaminant Levels (MCLs), Lab Certification	Department of Health Services, Sanitary Engineering

ST.UTES	REGULATION	APPLICABILITY	REGULATORY AGENCY
Hazardous Substances Act, Health and Safety Code Division 22, Chapter 13, Section 28740 et seq.		"Hazardous Substance" and "Toxic" broadly defined	Department of Health Services
Occupational Health and Safety Act, Labor Code Section 6300 et seq.		Worker safety, respon- sibilities and duties of employer.	Department of Indus- trial Relations, Div- ision of Industrial Safety
Porter Cologne Water Quality Control Act, Water Code, Division 7 Section 13000 et seq.	California Administrative Code, Title 23, Chapter 3	Identification of general duties and authorities of State and Regional Water Boards	State Water Resouces Control Board Regional Water Quality Control Board Department of Health Services
	Subchapter 9, Waste Dis- charge Reports and Require- ments		
	Subchapter 9.1, Enforcement Procedures and Septic Tank Prohibition Review by the (Water) Board.		
	Subchapter 10, Licensing and Regulation of Use of Oil Spill Cleanup Agents.		
	Subchapter 13, Registration and Regulation of Liquid Waste Haulers.		
	Subchapter 15, Discharges of Waste to Land.		

STATUTE

REGULATION

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(23 CAC, Chapter 3 Cont.)
Subchapter 16, Underground
Tank Regulation

Underground Tanks

Subchapter 20, Standards
for Removal of Sewage
from Vessels

Fish and Game Code, Division 6,
Part 1, Chapter 2, Sections
5650 and 5651

Fish and Wildlife, Water
Pollution Prohibition,
Correction of Chronic
Water Pollution

Department of Fish
and Game

California Administrative
Code, Title 8, Chapter 4

Health and Safety Re-
quirements

Subchapter 4, Construction
Safety Orders

Subchapter 5, Electrical
Safety Orders

Subchapter 7, General
Industry Safety Orders

California Administrative Code,
Title 14, Division 7, Chapter 3.
Standards for Solid Waste Hand-
ling and Disposal.

Solid Waste Management
Board

California Administrative
Code, Title 17, Chapter 5,
Subchapter 4, Group 3
Article 6, Section 30298.

Cleanup of radioactive
bearing hazardous waste
in buildings.

Department of Health
Services

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California Administrative Code,
Title 19, Chapter 2, Sub-
Chapter 3, Hazardous Materials
Release Response

Emergency Response
(Office of Emergency
Services)

Office of Emergency
Services (OES)

California Administrative Code,
Title 23, Chapter 4, Subchapter
15. Regulations for Implemen-
tation of the California En-
vironmental Quality Act of
1970 (Water Board Requirements)

Water Board CEQA
Regulations

State Water Resources
Control Board, Regional
Water Quality Control
Board

California Administrative Code,
Title 26, Toxics

Directory of Toxic
Related Regulations.

Office of Administrative
Law

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II. OTHER STANDARDS, REQUIREMENTS, CRITERIA AND LIMITATIONS

All policies and procedures for hazardous waste and hazardous materials management and cleanup adopted by the Toxic Substances Control Division.
Control Division.

Department of Health Services

Department of Health Services Decision Tree.

Development of site-specific
cleanup levels evaluation of
remedial action alternatives.

Department of Health Services

Department of Health Services Exposure Criteria.

Department of Health Services

- o RMCLs, MCLs, and action levels*
for unregulated chemicals in
drinking water.
- o Applied action levels* developed
by the Toxic Substances Control
Division.
- o Other cleanup levels developed
by the Toxic Substances Control
Division on a site specific basis.

Toxic air quality criteria policies or standards generated
Department of Health Services,
by the Department of Health Services or the Air Resources
Board.

Department of Health Services,

Air Resources Boards

Air Pollution Control District regulations.

Local Air Pollution Control
District

South Coast Air Quality Management District Rule 1150,
Excavation of Landfill Sites.

Permit requirements for exca-
vation at landfill sites.South Coast Air Quality
Management District

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South Coast Air Quality Management District Rule 1150.1, Control of Gaseous Emissions from Active Landfills. . Storage Tanks

Gas collection at active landfills.

South Coast Air Quality Management District Underground

Bay Area Air Quality Management District Regulation 8 Rule 40, Aeration of Contaminated Soil and Removal of Underground Storage Tanks.

Control of organic compounds during removal of underground tanks

Bay Area Air Quality Management District

Water Quality Control plans of the State Water Resources Control Board and the Regional Water Quality Control Board

Water Quality and Basin Plans

State Water Resources Control Board
Regional Water Quality Control Board

Other requirements of the State Water Resources Control Board and Regional Water Quality Control Boards.

State Water Resources Control Board
Regional Water Quality Control Board

All policies and procedures for water quality control adopted by the State Water Resources Control Board and the nine Regional Water Quality Control Boards.

Includes "Non Degradation" Policy

State Water Resources Control Board
Regional Water Quality Control Board

Regional Water Quality Control Board cleanup levels.

Regional Water Quality Control Board

Regional Water Quality Control Board site remediation guidance and criteria.

Regional Water Quality Control Board

All county hazardous waste management plans.

Department of Health Services

Hazardous Waste Move Committee Memorandum of Understanding.

Transportation of Hazardous waste during cleanup.

Department of Health Services,
Department of Transportation,
Highway Patrol

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General Orders of the Public Utilities Commission.

Public Utilities Commission

Notes:

1. Pursuant to the Superfund Amendments and Reauthorization Act, Section 121 (e), and associated state policies and requirements, permits may not be mandatory at Superfund sites.
2. The "Applicability" column is intended only to highlight some major elements of the statute or regulation. It is not designed to denote which sections of the code or statute apply.
3. The Department of Health Services reserves the right to amend this list pursuant to the intent of the Superfund Amendments and Reauthorization Act.

8/1/91

RWQCB COMMENTS ON RI/FS DRAFT FIELD SAMPLING PLAN
DATED JULY 12, 1991

p.9 End of last paragraph. Should be figure 1, not 3.

p.12 Section 4.5: Surface and Sediment Sampling. The Navy should evaluate the feasibility of conducting storm drain sampling from within the storm drains and not from off-shore or at the outfalls. Are there manholes which can yield access to the drains of interest? I refer the Navy to their own study of storm drain contamination at Hunters Point Annex, as a model (WESTDIV, July 10,91). Before individual storm drains are selected for sampling, a rational must be provided for choosing the drains and maps provided showing the areas of the facility and how they are drained.

p 13. and Appendix A (SOP 10): Sediments should be taken using an eckman or ponar dredge and/or sediment core collection device. The "pipe dredge" as described in Appendix A is not appropriate. Sediment cores should be logged in detail and copies supplied with the sampling report.

COMMENTS ON SITE SPECIFIC SAMPLING PROCEDURES

5.5 Fire Training Area:

Why were previous reports not reviewed prior to preparing this work plan? The RWQCB has had reports on the free product and fuel contamination for several years.

5.6 Pesticide Storage Area:

Soil samples should be taken where the waste water treatment sludge was disposed of if it has not already occurred. The workplan just describes perimeter soil borings.

5.11 Family Housing Area (Old Bunker Area)

Four borings by itself does not appear to be adequate coverage of this area. Additional surface sampling and geophysical surveys would be appropriate to fully characterize this site.

5.13 New Fuel Farm:

The RWQCB does not have a copy of the 1986 WESTDIV report for this site. Please supply a copy to the above address.

5.18 Auto Hobby Shop:

The Navy should have reviewed its own reports before submitting this workplan. PRC hired Riedel Environmental to remediate soil contamination. This workplan should start where there investigation left off.

8/1/91

RWQCB COMMENTS ON RI/FS WORK PLAN
DATED JULY 12, 1991

p. 22 The plan states that previous investigation reports for the Fire Training School "...were not available for review when completing this work plan." These reports were done for the Navy and the Navy sent them to this office years ago, so PRC should have reviewed them prior to finalizing these work plans. It is crucial that PRC pickup the investigation and remediation where other consultants left off. To the Board's knowledge, this would be the case at Building 225, the Auto Hobby Shop, the Fire Training School and, apparently, at the Fuel Farm.

p. 27 see above comment.

p. 31 see above comment.

p.44 Principle State ARAR's based upon RWQCB policy follow. I have included a brief summary of each policy but read the actual policies to fully understand and make an interpretation (attached).

State Water Resources Control Board Resolution 88-63: "Potential Sources of Drinking Water Policy":

Designates any groundwater a potential source of drinking water if TDS is less than 3,000 ppm and a water well in the aquifer can yield greater than 200 gallons per day.

State Water Resources Control Board Resolution 68-16: Statement of Policy with Respect to Maintaining High Quality of Waters in California.

Can not degrade and/or must return waters of the State (surface or ground waters) to original quality unless it can be shown that the condition will be "...consistent with maximum benefit to the people of the State,..."

We have other programs and regulations which could be considered ARARs. In addition, RWQCB's Water Quality Control Plan, also referred to as the "Basin Plan" is an ARAR. The most recent revision of the Plan (1986) contains objectives for discharge of waste water to the Bay. I have sent a summary of RWQCB programs and regulations to Bill Brown of the Department of Toxic Substances Control (for reference to ARAR's for the HPA project). The summary covers the Toxics Pit Cleanup Act of the Health and Safety Code, the Landfill regulations "Subchapter 15" of the California Code of Regulations, the

underground tank operation and cleanup regulations "Subchapter 16" of Title 23, CCR, the Porter Cologne Water Quality Act (under which the above policies are derived) and the Federal Clean Water Act NPDES permit program which applies to direct Bay discharges including storm drains.

STATE WATER RESOURCES CONTROL BOARD
RESOLUTION NO. 88- 63

ADOPTION OF POLICY ENTITLED
"SOURCES OF DRINKING WATER"

WHEREAS:

1. California Water Code Section 13140 provides that the State Board shall formulate and adopt State Policy for Water Quality Control; and,
2. California Water Code Section 13240 provides that Water Quality Control Plans "shall conform" to any State Policy for Water Quality Control; and,
3. The Regional Boards can conform the Water Quality Control Plans to this policy by amending the plans to incorporate the policy; and,
4. The State Board must approve any conforming amendments pursuant to Water Code Section 13245; and,
5. "Sources of drinking water" shall be defined in Water Quality Control Plans as those water bodies with beneficial uses designated as suitable, or potentially suitable, for municipal or domestic water supply (MUN); and,
6. The Water Quality Control Plans do not provide sufficient detail in the description of water bodies designated MUN to judge clearly what is, or is not, a source of drinking water for various purposes.

THEREFORE BE IT RESOLVED:

All surface and ground waters of the State are considered to be suitable, or potentially suitable, for municipal or domestic water supply and should be so designated by the Regional Boards¹ with the exception of:

1. Surface and ground waters where:
 - a. The total dissolved solids (TDS) exceed 3,000 mg/L (5,000 uS/cm, electrical conductivity) and it is not reasonably expected by Regional Boards to supply a public water system, or

- b. There is contamination, either by natural processes or by human activity (unrelated to a specific pollution incident), that cannot reasonably be treated for domestic use using either Best Management Practices or best economically achievable treatment practices, or
- c. The water source does not provide sufficient water to supply a single well capable of producing an average, sustained yield of 200 gallons per day.

2. Surface waters where:

- a. The water is in systems designed or modified to collect or treat municipal or industrial wastewaters, process waters, mining wastewaters, or storm water runoff, provided that the discharge from such systems is monitored to assure compliance with all relevant water quality objectives as required by the Regional Boards; or,
- b. The water is in systems designed or modified for the primary purpose of conveying or holding agricultural drainage waters, provided that the discharge from such systems is monitored to assure compliance with all relevant water quality objectives as required by the Regional Boards.

3. Ground water where:

The aquifer is regulated as a geothermal energy producing source or has been exempted administratively pursuant to 40 Code of Federal Regulations, Section 146.4 for the purpose of underground injection of fluids associated with the production of hydrocarbon or geothermal energy, provided that these fluids do not constitute a hazardous waste under 40 CFR, Section 261.3.

4. Regional Board Authority to Amend Use Designations:

Any body of water which has a current specific designation previously assigned to it by a Regional Board in Water Quality Control Plans may retain that designation at the Regional Board's discretion. Where a body of water is not currently designated as MUN but, in the opinion of a Regional Board, is presently or potentially suitable for MUN, the Regional Board shall include MUN in the beneficial use designation.

The Regional Boards shall also assure that the beneficial uses of municipal and domestic supply are designated for protection wherever those uses are presently being attained, and assure that any changes in beneficial use designations for waters of the State are consistent with all applicable regulations adopted by the Environmental Protection Agency.

The Regional Boards shall review and revise the Water Quality Control Plans to incorporate this policy.

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- 1 This policy does not affect any determination of what is a potential source of drinking water for the limited purposes of maintaining a surface impoundment after June 30, 1988, pursuant to Section 25208.4 of the Health and Safety Code.

CERTIFICATION

The undersigned, Administrative Assistant to the Board, does hereby certify that the foregoing is a full, true, and correct copy of a policy duly and regularly adopted at a meeting of the State Water Resources Control Board held on May 19, 1988.



Maureen Marche
Administrative Assistant to the Board

WATER RESOURCES CONTROL BOARD

RESOLUTION NO. 68-16

STATEMENT OF POLICY WITH RESPECT TO
HIGH QUALITY OF WATERS IN CALIFORNIA

The Legislature has declared that it is the intent that the granting of permits and licenses for water and the disposal of wastes into the waters shall be so regulated as to achieve highest quality consistent with maximum benefit to the people of the State and be controlled so as to promote the peace, safety and welfare of the people of the State; and

that such control policies have been and are being implemented throughout the State; and

that the quality of some waters of the State is higher than that provided for by the adopted policies and it is the intent of the Board that such higher quality shall be maintained to the maximum extent possible consistent with the intent of the Legislature;

IT IS RESOLVED:

That the existing quality of water is better than that provided for in policies as of the date on which such policies become effective, such existing high quality shall be maintained until it has been demonstrated to the Board that a change will be consistent with maximum benefit to the people of the State, will not unreasonably affect anticipated beneficial use of such water and will not result in water quality less than that prescribed

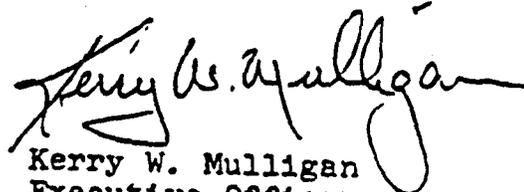
in such cases which produces or may produce a waste or increase in the concentration of waste and which disposes to discharge to existing high quality waters. Such discharge shall be required to meet waste discharge requirements which result in the best practicable treatment or discharge necessary to assure that (a) a pollution incident will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State shall be maintained.

That in implementing this policy, the Secretary of the Interior shall be advised and will be provided with such information as may be needed to discharge his responsibilities under the Federal Water Pollution Control Act.

this resolution be forwarded to the Secretary of the Interior as part of California's annual report to the United States.

ON

At a meeting of the State Water Resources Control Board held on the 15th day of August, 1968, the foregoing is a full, true and regularly adopted resolution of the Board.


Kerry W. Mulligan
Executive Officer
State Water Resources
Control Board