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California Regional Water Quality Control Board

San Francisco Bay Region

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TREASURE ISLAND
SSIC NO. 5090.3.A



Gray Davis
Governor

Date: November 16, 1999
File No. 2169.6013 (CRM)

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402
Attention: Mr. Ernesto Galang

Subject: Leachate Sampling Results Technical Memorandum for Total Petroleum Hydrocarbons at Site 12, Treasure Island Naval Station, San Francisco

Dear Mr. Galang:

On June 25, 1999 Regional Board staff (Board staff) received a draft version of the above-referenced technical memorandum (Draft Technical Memorandum). Board staff provided written comments on the Draft Technical Memorandum on July 27, 1999. Board staff's comments indicated *"the absence of soil TPH data from the same samples used for the leachate tests makes these results useful qualitatively at best. The estimation of soil concentrations corresponding to water quality criteria does not seem appropriate given the limited amount and quality of the available data, and given the uncertainties associated with the data."*

On October 22, 1999 Board staff received the Final version of the Technical Memorandum (Final Technical Memorandum). The introduction to the Final Technical Memorandum indicates *"...the objective of this study was to determine the leaching potential of TPH in vadose zone soil at Site 12. However, the results of this study are inconclusive because the leachability testing may not be appropriate for conditions encountered at Site 12 and due to incomplete data."* Board staff concurs with this statement.

The Discussions and Recommendations of the report again state that the results of the leachability study are inconclusive, and provide several reasons why the data collected were inadequate to accurately determine the potential threat to ground water quality posed by residual TPH in the vadose zone soils. We concur with these conclusions. However, we are puzzled by the final conclusion on page 8 of the Final Technical Memorandum, which states *"...residual TPH contamination in soil does not appear to be a significant source of contamination to ground water at Site 12. No further TPH leachability testing is proposed at Site 12."*

The Navy has acknowledged that the data collected were inadequate to achieve the objectives of the study, and has provided a very limited technical rationale to argue that TPH in soil (saturated and unsaturated zones) does not pose a threat to water quality. Considering that the study did not achieve the objectives, Board staff is rejecting the Final Technical Memorandum. We consider

the issue of the threat to water quality posed by TPH in soils to remain unresolved. The Navy should develop a scope of work to resolve this issue in an expedient manner. If leachability testing is not the appropriate means to resolve this issue, the Navy should present alternate methods for consideration by the regulatory agencies.

If you have questions regarding these comments, please feel free to call me at (510) 622-2377.

Sincerely,

Chris Maxwell
Associate Engineering Geologist
Ground Water Protection and Waste
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cc: Mr. James Ricks, Jr. (SFD-8-2)
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