

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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TREASURE ISLAND

SSIC NO. 5090.3.A



December 3, 1991

File No.: 2169.6013 (BMS)

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Ernesto M. Galang
Code 1813EG
Western Division
Naval Facilities Engineering Command
P.O. Box 727
San Bruno, CA 94066-0720

Subject: Naval Station, Treasure Island, San Francisco,
California, Suitability Study of Floating Product
Removal, Draft Summary Report, November 5, 1991

Dear Mr. Galang:

The staff of the San Francisco Regional Water Quality Control Board (SFRWQCB) have completed their review of the above document that was received in our offices on November 12, 1991. The following are general and specific comments that should be addressed.

GENERAL

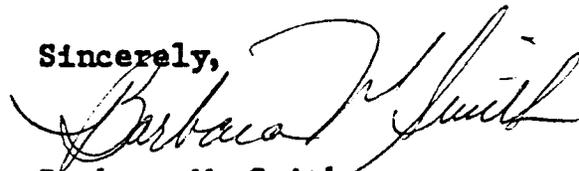
1. This report is incomplete and does not adequately address the question of the suitability of floating product removal.
2. There are no acceptable chemical analytical data for the Fuel Farm Area (FFA). The physical data presented for the FFA from the slug test of the piezometer well B1 demonstrated that soils in this area appear to be fairly permeable, yet no conclusions or specific approaches to address the problem of floating product in this area were put forth. If floating product removal is not to be recommended in this area, the reasons for this position must be clearly stated. If contaminated soil is to be removed because the area of floating product is small, that approach should be presented. The report did not contain any information as to how the data gaps for the FFA would be rectified.
3. Data demonstrating the presence of measurable amounts of floating product in Well 6 (Table 3) in the Fire Training Area (FTA) were presented, yet no discussion of specific approaches to address the problem of floating product in the vicinity of this well were put forth. If floating product removal is not to be recommended in this area, the reasons for this position must be clearly stated. If contaminated soil is to be removed because the area of floating product is small, that approach should be presented.

SPECIFIC

1. p. 12, Section 4.1, paragraph 3: The results of chemical analyses for the FFA presented in this section are essentially useless. SFRWQCB comments on the Draft Field Workplan (8/1/91) specifically stated that piezometer wells are not "capable of functioning as groundwater monitoring wells." These types of wells typically have very short screened intervals, and therefore, they are not appropriate to function as monitoring wells where the screened interval typically extends across the entire length of the aquifer to be sampled.
2. p. 14, Section 4.4, bullet 2: Modify to read, "Areal extent..." This estimate is probably a conservative minimum rather than the maximum implied by the text. The fact that floating product was found in monitoring wells 1 and W3, which are approximately 25 feet from the tanks, suggests that the minimum radius of a circular plume may be 25 feet, leading to an areal estimate of 2,000 ft². The fact that floating product was found in these wells indicates that the full extent of the floating product plume has not yet been determined.
3. p. 15, Section 5.0, bullet 3: The analytical results do not suggest that the plume "is of limited areal extent" but rather that the plume may not be circular, and may extend farther along the east-west axis than the north-south axis.
4. p. 15, Section 6.0, item 2: No indication is made as to how the proposed four additional monitoring/recovery/extraction wells around Tanks A and B and the three wells around Tank C will be situated in order to "further evaluate the feasibility of product recovery".
5. p. 24, Table 5: Modify the symbol in parentheses under "Salinity" to "%/oo" or "ppt".

Please direct your questions or comments to me at (510) 464-4222.

Sincerely,



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cc: Treasure Island

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