



California Regional Water Quality Control

San Francisco Bay Region

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Protection

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TREASURE ISLAND
SSIC NO. 5090.3.A



Gray Davis
Governor

Date: December 2, 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: Summary of October 27, 1999 Meeting Regarding Water Quality Issues for
Naval Station Treasure Island, San Francisco**

Dear Mr. Galang:

Introduction

On October 27, 1999 Regional Board staff (Board staff) hosted a meeting to discuss water quality issues at Treasure Island. The meeting included representatives from the Navy, City of San Francisco, California Department of Toxic Substances Substances Control (DTSC), and the United States Environmental Protection Agency (USEPA). The seven discussion items from the meeting were (1) the Remedial Investigation and Feasibility Study (RI/FS) Process; (2) Ground Water Beneficial Uses; (3) Petroleum Hydrocarbons in Ground Water; (4) the Point of Compliance for Application of Ground Water Cleanup Goals; (5) Ambient Levels of Metals in Ground Water; (6) Leaching of Non-Petroleum Contaminants in Soil; and, (7) Prioritization of RI/FS Activities.

One of the action items was that Board staff would provide follow-up letters clearly documenting our position regarding the seven above-referenced issues. Since that time, Board staff has provided six letters to the Navy. The dates of these six letters are October 27th and 29th, and November 3rd, 15th, 16th, and 23rd. The purpose of this letter is to address the two issues that were not specifically discussed in our previous six letters, which are Ground Water Beneficial Uses and Ambient Levels of Metals in Ground Water.

Ground Water Beneficial Uses

On September 17, 1999 Board staff submitted for public comment a Draft Functional Equivalent Document for Proposed Groundwater Amendments to the Water Quality Control Plan. The Navy was included on the mailing list for the document. The document includes a proposal to amend the Basin Plan and eliminate the Municipal and Domestic Water Supply (MUN) beneficial use designation for ground water at Treasure Island. Public workshops regarding the document were held on October 12 and 28, 1999. The public comment period for the document ended on November 15, 1999.

The cover letter to the document indicates Board staff's intent to bring the Basin Plan amendment before the Regional Board for consideration of adoption in January 2000. However, at this time the Regional Board does not have a quorum and the date and time of the next meeting of the Regional Board is uncertain. Board staff will keep the Base Closure Team (BCT) for Treasure Island updated regarding the status of this Basin Plan amendment.

Note that the MUN use designation for ground water at Treasure Island is not the only factor to consider in determining assessment requirements and cleanup goals for areas of degraded ground water. Please see Board staff's previous letters regarding the requirements of State Water Resources Control Board (SWRCB) Resolutions No. 68-16 and 92-49. Regardless of the assigned beneficial uses, the Navy is required to fully assess the extent of impacts to ground water, and to fully evaluate the technical and economic feasibility of cleanup for these areas. The presence or absence of the MUN designation would be an important factor for any risk management decisions under the containment zone provisions of SWRCB Resolution No. 92-49.

Ambient Levels of Metals in Ground Water

Remedial Investigation (RI) activities at Treasure Island have indicated the presence of elevated concentrations of various metals in ground water. In some cases, these levels may represent background conditions rather than a release of contaminants. However, the Navy has yet to fully evaluate background conditions. Board staff suggests that the Navy develop ambient levels for metals in ground water for consideration by the BCT. This information will be necessary to complete the RI for various sites at Treasure Island.

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

Sincerely,



Chris Maxwell
Associate Engineering Geologist
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