

STATE OF CALIFORNIA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

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SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, SUITE 500  
OAKLAND, CA 94612

August 31, 1993  
File No. 2169.6013 (GK)

Ernie Galang  
WESTDIV  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, California 94066-2402

Sub: Comments on Naval Station Treasure Island Monthly Progress Review Meeting Minutes - 20 July 1993

Dear Mr. Galang,

The San Francisco Bay Regional Water Quality Control Board staff disagrees with the presentation of the July 20th Monthly Progress Meeting Minutes; especially Item 4: Recommendations for Possible Removal Actions at Sites 1, Medical Facility, and Site 9, Foundry.

- **THERE ARE NO BACKGROUND VALUES FOR NAVAL STATION TREASURE ISLAND.** If it is necessary to compare concentration levels found at Treasure Island, please use ambient levels, the term background is both confusing and misleading. Ambient levels should be established through a statistical analysis of the soil data at the base. The data gathered for such a statistical analysis must be taken from areas not impacted by base operations.
- The risk assessment for these sites were based on average concentrations at the site, the risk assessment was not based on the high concentrations found such as 7740 mg/kg of silver or 974 mg/kg of lead. Lead at 1000 mg/kg and silver at 100 mg/kg are considered hazardous materials.

The SFRWQCB agrees that removal actions are warranted at Sites 1 and 9 due to elevated silver and lead, respectively. Comparisons should not be made to "background levels", ambient levels may be used once properly established.

Although a basewide Risk Assessment (RA) has been done and silver and lead concentrations are within an acceptable human health risk range, only the average silver and lead concentrations of the entire base were used in the RA. The actual risk from the "hot spots" have not been determined yet.

If you have any questions or comments, please call me at the San Francisco Bay Regional Water Quality Control Board (510) 286-4267.

Sincerely,

Gina Kathuria  
Remedial Project Manager

cc: Thomas Lanphar  
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Berkeley, California 94710-2737

ADMIN RECORD (3 COPIES)