

## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

WEST STREET, SUITE 500

SAN FRANCISCO, CALIFORNIA 94612

286-1255



October 29, 1993

File No. 2169.6013 (GK)

Mr. Thomas Lanphar  
Department of Toxic Substances Control  
Region 2  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2737

**SUBJECT: BACKGROUND VALUES FOR FILL AT NAVAL STATION TREASURE ISLAND**

Dear Mr. Lanphar,

The issue of background values for fill at Treasure Island (TI) has been a concern of the San Francisco Bay Regional Water Quality Board (RWQCB). On September 27th, the RWQCB received response to a letter addressed on August 31, 1993 to the Navy.

The RWQCB recommends that ambient levels be established through a statistical analysis of the soil data at the base and that the data gathered for the statistical analysis be taken from areas not impacted by past or present base operations. The Navy responded by stating that this recommendation is in conflict with the approach discussed at a meeting held on December 17, 1992. The RWQCB reviewed the minutes from that meeting and the Navy's statement is inaccurate, the RWQCB is not in conflict with the original approach discussed in the December 17th meeting.

The minutes from the December 17, 1993 meeting are as follows:

"Initially, Ms. Smith proposed that a random grid sampling scheme be developed to determine background concentrations at Yerba Buena and Treasure Island. Mr Lanphar suggested that comparing the site analytical data to literature values as a first step would probably be acceptable since the background data will be used for discussion purposes only and will not be used to determine clean-up goals. Ms. Smith agreed, and suggested that PRC begin by reviewing any applicable reports on Yerba Buena Island prepared by U.S. Geological Survey. As a result of this approach PRC will determine background values separately for the two islands based on published literature."

The RWQCB interprets this as meaning that it is acceptable to survey the literature to see if appropriate data of acceptable quality is available to determine background values at both the islands. The RWQCB requests to see how the background values were established at Site 1 and Site 9. Was appropriate data of acceptable quality used?

As discussed in the RPM Meeting held on October 20, 1993 background sampling will

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be included in the Phase II RI/FS Workplan, the RWQCB will comment at that time on the appropriate protocol for developing background values in fill.

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

Sincerely,



**Gina Kathuria**  
Remedial Project Manager

cc: Mr. Ernie Galang  
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ADMIN RECORD (3 COPIES)