

STATE OF CALIFORNIA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

WEBSTER STREET, SUITE 500

OAKLAND, CA 94612

(510) 286-1255

March 4, 1994

File No. 2169.6013 (GK)



Commanding Officer
Western Division
Attn: Mr. Ernesto Galang, Code 1813
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-0720

**SUBJECT: CLARIFICATION OF COMMENTS DATED FEBRUARY 4, 1994 ON DRAFT
RI REPORT, PHASE I, NAVAL STATION TREASURE ISLAND**

Dear Mr. Galang:

This is to clarify some issues raised in CAL-EPA's comments on the Draft RI, Phase I Report, dated November 8, 1993.

Two technical papers were referenced in our comments with regard to establishment of soil background levels. The purpose of providing these two papers is to show how soil background levels of lead in particular can vary significantly from site to site. Therefore, it is very important that background levels be established based on soil samples that are representative of the site background conditions.

Interpretations of Water Board Resolution Nos. 68-16 (Antidegradation Policy) and 88-63 (Sources of Drinking Water) were given in Specific Comments on the Draft Baseline Human Health Risk Assessment by DTSC Comment No. 4. The following provides a more appropriate interpretation of the Water Board policies:

Resolution No. 68-16 is a policy with respect to maintaining the existing high quality of waters in California. Degradation is not permissible until it has been demonstrated that such change is consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial use of such water, and will not result in water quality less than that prescribed in the policies.

Resolution No. 88-63 considers all surface and ground waters of the State, with few specific exceptions, are potential drinking water sources.

If you have any questions with this letter, I can be reached at the San Francisco Bay Regional Water Quality Control Board at (510) 286-4267.

Sincerely,

Gina Kathuria
Project Manager

cc: Tom Lanphar, DTSC
Jim Sullivan, NAVSTA TI
Admin Record (3 copies)

210