

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, SUITE 500

SAN FRANCISCO, CA 94612

286-1255



July 25, 1994

File No: 2169.6013 (GK)

Mr. Ernie Galang
WESTDIV
900 Commodore Drive
San Bruno, California 94066

**SUBJECT: COMMENTS ON THE DRAFT FINAL PHASE IIA REMEDIAL
INVESTIGATION FIELD WORKPLAN ADDENDUM, dated June 13,
1994**

Dear Mr. Galang:

Below are the comments from CAL-EPA San Francisco Bay Regional Water Quality Control Board (RWQCB) staff's review of the above referenced document.

GENERAL COMMENTS

1. It is unclear whether filtered or unfiltered groundwater samples will be collected during this sampling event for metals analyses. The San Francisco Bay RWQCB prefers data from filtered and unfiltered groundwater samples for evaluating impact to groundwater quality. If it is unfeasible to collect both filtered and unfiltered groundwater samples for this event, the RWQCB will only accept **unfiltered** metals analyses data.
2. According to the State Water Resources Control Board Resolution No. 88-63 "Sources of Drinking Water", all surface and groundwaters of the State are considered suitable, or potentially suitable for municipal or domestic water supply unless: (1) Total dissolved solids (TDS) exceed 3,000 mg/l or (2) The water source does not provide sufficient water to supply a single well capable of producing an average, sustained yield of 200 gallons per day. Groundwater data, especially TDS concentrations, obtained during this sampling event should be able to help in determining the beneficial uses of the groundwater relative to Resolution 88-63. If the groundwater is declared as not a potable water supply due to high TDS, then the groundwater maybe in communication with the San Francisco Bay. Therefore, it will be appropriate to compare the groundwater data with the water quality standards established for protection of the beneficial uses of the Bay. *In essence, the quantitation limits used in analyzing the groundwater should be re-evaluated to ensure they are low*

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enough to compare to the appropriate criteria (EPA 400 series test methods can reach lower detection limits than the ones proposed in this workplan).

SPECIFIC COMMENTS

3. Page 7, 2nd Paragraph: The RWQCB will require that when abandoning wells the California Department of Water Resources' California Well Standards Bulletin 74-90 be used. To obtain a copy call (916) 445-9371.

If you have any comments or concerns, I can be reached at the San Francisco Bay Regional Water Quality Control Board at (510) 286-4267.

Sincerely,



**Gina Kathuria
Project Manager**

cc: Mr. Tom Lanphar
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Admin Records (3 Copies)