

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737



(510) 540-3724

August 17, 1994

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

Dear Mr. Galang:

DRAFT FIELD WORK PLAN ADDENDUM FOR SITE 1 - MEDICAL CLINIC, NAVAL STATION TREASURE ISLAND

The California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) has reviewed the draft Field Work Plan Addendum for Site 1. This letter transmits comments from the DTSC and RWQCB. The comments of the RWQCB are attached to this letter. The following are the comments of the DTSC. Comments of the DTSC and RWQCB must be responded to prior to finalizing this work plan.

Comments of the DTSC

1. Section 2.2.3, Soil and Groundwater Characteristics, Page 7

Groundwater flow direction has not been sufficiently characterized at Site 1. Flow direction can not be determined through a single well. A better characterization of groundwater may be required if evidence is not provided showing that groundwater has not been impacted.

2. Section 2.3.4, ARARS/Potential Cleanup Levels, page 7

The baseline human health risk assessment which calculated a PRG of 1,790 mg/kg is not a final approved document. This cleanup level is unacceptable to DTSC. U.S. EPA Preliminary Remediation Goal of 390 mg/kg is a more appropriate cleanup goal for this site.

3. Section 3.0, Additional Characterization, page 8

The approach for determining the extent of silver contamination at Site 1 should be reconsidered.

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Currently, soil pH will be used to help determine the extent of silver contamination. Four surface soil samples will be collected for laboratory analysis just beyond the extent of acidic soils as indicated by the pH field screening. If pH field screening indicates basic soil conditions at all locations, surface samples will be collected at locations indicated on Figure 4.

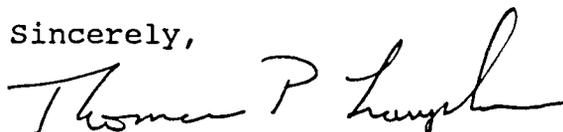
The DTSC does not agree with that approach. There may be no relationship between soil pH and silver contamination. Collecting laboratory samples beyond the acidic soil boundary may be beyond the area of silver contamination. Silver contamination, on the other hand, may extend beyond acidic soil.

Collecting four soil samples for silver analysis will not provide the data required to define the lateral extent of contamination. The objective of soil sampling should be to determine the decreasing levels of contamination with distance in the soil at Site 1. This information is needed to conduct a feasibility study for soil removal at the site. Knowing how quickly silver levels decline from the high hits collected by Dames and More in 1988 will aid in determining what amount of soil would require remediation at various cleanup levels. A comparison could then be made between removing only the hot spot and remediating soil below the U.S. PRG for residential land use. Further, if samples are taken only outside the acidic soil area, these samples may contain silver below the selected cleanup goal. Therefore, we would not know how much soil would require remediation.

The four confirmation samples proposed by the Navy are too few to allow the characterization needed at Site 1. A minimum of eight confirmation samples are required to provide the information needed to make decisions on the remediation of Site 1.

If you have questions regarding these comments, please contact me at (510) 540-3809. If appropriate a conference call may be arranged to discuss our comments. You may contact the RWQCB, but should do so after contacting DTSC to ensure a coordinated approach for all regulatory comments.

Sincerely,



Thomas P. Lanphar
Project Manager
Office of Military Facilities

Enclosure

cc: See next page

Mr. Ernesto Galang
August 17, 1994
Page Three

cc: Ms. Gina Kathuria
San Francisco Bay
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Mr. Jim Sullivan,
BRAC Environmental Coordinator
Code 80
Naval Station, Treasure Island
410 Palm Avenue
San Francisco, California 94130-0410

Ms. Rachel Simons
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Admin Records (3 copies)

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

1 WEBSTER STREET, SUITE 500

OAKLAND, CA 94612

(510) 286-1233



August 5, 1994
File No: 2169.6013 (GK)

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

**SUBJECT: COMMENTS ON SITE 01- MEDICAL CLINIC ADDITIONAL
CHARACTERIZATION FIELD WORK ADDENDUM DRAFT, dated June
27, 1994**

Dear Mr. Lanphar:

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

GENERAL COMMENTS

1. The RWQCB is not convinced that silver has not impacted groundwater. Vertical extent of the contamination in soil has not been determined, thereby potential impact to groundwater still exists. Additional sampling events for monitoring well 01-MW-01 is needed to provide evidence that groundwater has not been impacted.

SPECIFIC COMMENTS

2. Page 5, 2nd Paragraph: For the well that was installed at Site 01 by PRC as part of the Phase I RI, please specify if the monitoring well is downgradient from the source.
3. Page 5, 3rd Paragraph: A single sample event does not provide adequate

information to determine if groundwater has been impacted. See comment 1.

4. Page 5, 3rd paragraph: The statement that SMCLS are not ARARs for this site is inaccurate. **SMCLs are ARARS for NAVSTA TI.** The San Francisco Basin Plan, which is an ARAR for NAVSTA TI, states "Waters shall not contain taste or odor-producing substances in concentrations that impart undesirable tastes or odors to fish flesh or other edible products of aquatic origin, that cause nuisance, or that adversely affect beneficial use".

The statement that the groundwater is not expected to be a drinking water source at NAVSTA TI is unsupported by any site specific data. According to the State Water Resources Control Board Resolution No. 88-63, all waters of the State are considered to be suitable, or potentially suitable, for municipal or domestic water supply unless the total dissolved solids exceed 3000 ppm or the water source does not provide sufficient water to supply a single well capable of producing an average, sustained yield of 200 gpd. Please modify text.

5. Page 6, Figure 3: Please include the following in the Figure: (1) site-specific flow direction, (2) detection limit for silver in soil and in groundwater
6. Page 7, ARARs/Potential Cleanup Levels: Please elaborate on the statement that there are no ARARs that apply for silver in soil. There are action and location specific ARARS that may apply to silver in soil.

7. Page 8, Top of Page:

- (1) *1st bullet:* One round of groundwater sampling does not provide enough evidence that groundwater has not been impacted by silver contaminated soil.
- (2) *2nd bullet:* Once the extent of contamination has been delineated (vertical & lateral) and the soil has been removed accordingly, then a leachability test is needed to provide evidence that the remaining soil provides no impact to water quality at this site.
- (3) *3rd bullet:* What evidence is there to support this statement that no known terrestrial ecological receptors exist at this site? Is this based on site walks? Please provide more rationale for this statement.

8. Page 8, pH Field Screening: This leak of developer and fixer solution occurred up until the early 1970s, can we expect the chemicals to still have low pH

characteristics? If not, how can pH be a valid indicator of extent of contamination?

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