

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**

TREASURE ISLAND

SAN FRANCISCO BAY REGION

SSIC NO. 5090.3.A

WEBSTER STREET, SUITE 500  
AND 94612

Phone: (510) 286-1255

Fax: (510) 286-1380

BBS (510) 286-0404



July 12, 1996

File No: 2169.6013 (GK)

Mr. John Pfister  
Environmental Programs Center  
Engineering Field Activity - WEST  
900 Commodore Drive  
San Bruno, CA 94066-2402

**SUBJECT: COMMENTS BY THE SAN FRANCISCO BAY REGIONAL WATER QUALITY CONTROL BOARD FOR THE NAVAL STATION TREASURE ISLAND DRAFT SUMMARY REPORT OF UNDERGROUND STORAGE TANK REMOVALS, dated January, 1994**

Dear Mr. Pfister:

Since the above referenced document has been submitted to the RWQCB, there have been several changes within the UST and Installation Restoration programs. The changes are minor and do not warrant a re-write of the above referenced document. RWQCB staff has reviewed the document and concurs with the Navy in its recommendations with a few exceptions.

For tank sites: 1B, 1C, 1D, 1F, 111, 169, 180A, 180B, 2A, 2D, 330C, 330D, RWQCB staff concurs with the Navy's no further action recommendation and we will issue a closure letter for these tank sites.

For tank sites 111 and 169, which were closed in place, the rationale was vague as to why closer in place for these tanks was the preferred option. This prompted (1) RWQCB staff to conduct a site visit to these tank sites; (2) the Navy to send a letter clarifying the rationale for closure in place, dated May 14, 1996; and (3) the Navy and RWQCB staff to meet several times to resolve this issue.

In summary, tank 111 was closed in place for two reasons: potential erosion problems with removing such a large tank (37,500 gallons) and the limited access for equipment to the site due to the inclined surface (the tank site is located in the higher elevated portion of Yerba Buena Island). Soil samples were taken around the tank and RWQCB staff believes the petroleum impacted soil poses minimal threat to human health and the environment (BTEX measured from low levels to non-detect at depth) and minimal threat to water quality (the groundwater table is expected to be at sea level which is approximately 60 feet bgs). On this basis, RWQCB staff concurs with the closure in place of tank 111.

Tank 169 is located on a steep slope underneath a cliff by the beach on YBI. The tank was closed in place because of the difficulty associated with removing it from this area. No soil or groundwater samples were obtained because there is no access from the road to the tank site to maneuver equipment. The tank was cleaned and free product was removed so the issue of source removal has been addressed adequately. Any potential offshore impacts to the sediment will be addressed under the ecological risk assessment. RWQCB staff concurs with the Navy's decision to close this tank in place.

For tank sites IE, 180C, 201, 227, 368A, 368B RWQCB staff concurs with recommendation to place these sites in the UST program for further investigation.

For tank sites: 2C, 240A, 240B, 330 (A, B, E, F), RWQCB staff understands that these tanks have been moved to the UST program from the IR program as described in a letter dated May 22, 1996 from the Navy. A draft corrective action plan (CAP) is expected later in December of this year.

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

Sincerely,



Gina Kathuria, P.E.  
Project Manager

cc: Chein Kao, DTSC  
Rachel Simons, USEPA  
Jim Sullivan, NSTI  
Ernie Galang, EFA-WEST

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