



EPA

Department of  
Toxic Substances  
Control

700 Heinz Avenue  
Suite 200  
Berkeley, CA  
94710-2737

May 20, 1997

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TREASURE ISLAND  
SSIC NO. 5090.3.A



Commanding Officer  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
Attn: Mr. Ernesto Galang  
900 Commodore Drive  
San Bruno, CA 94066-2402

Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

DRAFT REMEDIAL INVESTIGATION REPORT ADDENDUM NC. 3,  
ECOTOXICOLOGICAL TESTING FOR THE DEVELOPMENT OF  
PETROLEUM SCREENING LEVELS, NAVAL STATION TREASURE  
ISLAND (APRIL 17, 1997)

Dear Mr. Galang:

The San Francisco Bay Regional Water Quality Control Board, in conjunction with the Department of Toxic Substances Control (the State), has reviewed the Draft Remedial Investigation Report Addendum No. 3, Ecotoxicological Testing for the Development of Petroleum Screening Levels. We have found that, although the data were gathered in accordance with the approved workplan, the interpretation of the data is difficult to follow. In addition, we expected that leachate factors for petroleum and its constituents would be determined. We request copies of (1) raw toxicity lab data related both to the areas of concern (IR sites) and the reference sites, (2) reference toxicant data, and (3) lab reports for the chemical analysis. Specific comments are enclosed.

We look forward to setting up a meeting with the Navy and the State's technical experts to discuss and resolve these issues.

If you have any questions regarding this letter, please contact me at (510) 540-3769.

Sincerely,

*Mary Rose Cassa*

Mary Rose Cassa, R.G.  
Engineering Geologist  
Office of Military Facilities

enclosure

Mr. Ernesto Galang  
May 20, 1997  
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cc: Ms. Gina Kathuria  
San Francisco Bay  
Regional Water Quality Control Board  
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Oakland, CA 94612

Ms. Rachel Simons (SFD-8-2)  
U. S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
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Ms. Martha Walters  
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770 Golden Gate Avenue  
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Jim Sullivan, BEC

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Admin Record File (3 copies)



concentration in soil? How close is the concentration to the AWQC value?

- (b) What was the impact on the data set evaluated by this screening procedure. In other words, how much data was eliminated before calculation of the petroleum screening levels?

5. Page 27, 5.2.1.2 Organics Toxicity: RWQCB staff is unaware of a criteria of 1.8 ppb for Xylene. Please list the reference for this number and how it was used to screen data.
6. Table 6: The Water Quality Criteria listed in this table are incorrect in some cases. Please revise some of the numbers. For example, Copper is 5.8/2.9 ppb (not 2.9 ppb), total PAHs is 15 ppb (not 300 ppb), lead is 5.6 ppb (not 220 ppb), benzene is 21 ppb (not 5100 ppb, based on fish consumption).
7. Tables 7, 8, 9:
- (a) Please clarify how the Leachate Factor (percent) was calculated. The Eluate sample result divided by the soil sample result does not give the values currently listed in the Leachate Factor column.
  - (b) Please eliminate sample 199TT11, it seems inappropriate to consider this sample in the leachate factor calculation. The eluate sample was of higher concentration than the soil concentration. There must have been either a lab error or sampling error in the analysis of this sample.
  - (c) Please eliminate samples , such as sample 199TT12, where the eluate had non detect concentrations of petroleum.
  - (d) RWQCB staff plotted soil concentration vs eluate concentrations and found the relationship to be nonlinear. To average the data and calculate one leachate factor for petroleum seems inappropriate. Please re-evaluate the data to calculate a more appropriate leachate factor. RWQCB staff would like to participate in discussions with the Navy as to the most appropriate method to evaluate this data.

8. Table 12 and Table 13: Again, due to the variability of data results across petroleum types (gasoline, diesel, motor oil) and from site to site, it seems inappropriate to average the data. RWQCB staff believe it may be more appropriate to calculate site specific petroleum (for gasoline, diesel, and motor oil) screening levels.