



San Francisco
Bay Regional
Water Quality
Control Board

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TREASURE ISLAND
SSIC NO. 5090.3.A



Pete Wilson
Governor

July 27, 1998
File: 2169.6013

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

Re: Comments on Draft Additional Characterization of Total Petroleum Hydrocarbons at Site 12 - Old Bunker Area, Field Sampling Plan Addendum, dated July 13, 1998.

Dear Mr. Galang:

Thank you for the opportunity to review the above-referenced document. Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) staff comments are presented below.

COMMENTS

Page 2, Section 2, Background. 1) Line 3. Please include a discussion of the rationale for conducting additional characterization at Site 12. 2) The former incinerator should be added to the list of items that were assessed during the Remedial Investigation (RI). 3) Please provide a definition of "low levels of TPH". 4) The sentence that begins "In conjunction with the regulatory agencies" is misleading in that it implies that the regulatory agencies participated in the development of the process adopted by the Navy to generate TPH screening levels, and concurred in the application of the process. This sentence should be modified to clearly reflect the ongoing discussions that have taken place with respect to this issue. 5) The statement in the last sentence regarding the use of mysid shrimp toxicity tests needs clarification. One objective of a toxicity testing program is to characterize impacts of discharges to a range of ecological receptors, including sensitive receptors. This objective is often met by conducting tests using a suite of organisms. The use of mysid shrimp as one of

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a suite of test organisms would help meet the objective. To state that the TPH screening level proposed by the RWQCB is based on toxicity to mysid shrimp, while specifically accurate, does not reflect the larger context in which the use of any particular organism (in this case mysid shrimp) might be selected. For example, use of specific species might have the objective of identifying an organism that could represent sensitive receptors from among a suite of organisms used in a toxicity testing program. As it happens, mysid shrimp have been observed to be among the more sensitive species in suites of tests run on soil and groundwater containing petroleum hydrocarbons.

Page 2, Section 3, Objectives. 1) The discussion in the first paragraph would be better placed in the introduction or background sections or deleted entirely as it has little to do with objectives. If the Navy wants to include this information elsewhere in the report, the discussion should be modified to reflect the cooperative spirit in which the Navy worked with the regulatory agencies to develop a method of addressing TPH concerns at Site 12. As a suggestion, the discussion could begin with "Because EFA West and the regulatory agencies have not reached agreement on TPH screening levels, and to facilitate progress at sites impacted by TPH at Treasure Island, the BCT worked cooperatively to develop an approach for Site 12 that would advance the cleanup process. It was agreed that this approach would not set precedent for other sites either at Treasure Island or in the Bay Area. The approach developed addresses the RWQCB's criteria for low-risk fuel sites and uses a groundwater screening level of 1.4 mg/L." 2) The first bullet should be modified to read "Further delineate the extent of groundwater containing TPH with the potential to impact water quality and biological receptors in San Francisco Bay". 3) The fourth bullet suggests that MTBE will only be evaluated at the single location where it was previously detected. Table 3 states that MTBE will be reported for all groundwater samples collected. It is our understanding that all groundwater samples will be analyzed for MTBE. 4) The fifth bullet also should be modified to "...groundwater containing TPH with the potential to impact water quality and biological receptors in San Francisco Bay".

Section 4.1.6. The RWQCB requests that groundwater samples collected at previously sampled locations be analyzed with and without silica gel cleanup. In the absence of data collected and analyzed in a manner consistent with previous programs, it will not be possible to assess whether differences are the result of changed environmental conditions or an artifact of different analytical methods.

Section 4.3.1. The format for sampling labeling should read 242WWnnn.

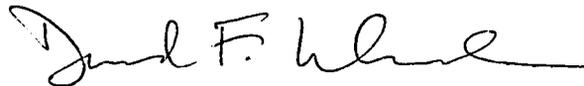


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Table 3. It is our understanding that all groundwater samples will be run for the 4 analyses noted in the second column.

If you have any questions regarding these comments, please call me at 510-286-4267. Please note my phone number as of August 3, 1998 will be 510-622-2377 at the new RWQCB offices at 1515 Clay Street, Oakland.

Sincerely,



David F. Leland, P.E.
Groundwater Protection and Waste
Containment Division

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