



California Regional Water Quality Control Board

San Francisco Bay Region



Gray Davis
Governor

Anton H. Hickox
Secretary for
Environmental
Protection

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March 10, 1999
File No. 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 Final Technical Memorandum Sampling Plan and Health and Safety Plan, Delineation Sampling, Site 12 TPH Contaminated Soil Removal Action, Treasure Island, San Francisco, California (dated March 1999)

Dear Mr. Galang:

Thank you for submitting the above-referenced document. The Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) staff had commented verbally to the Navy on the draft sampling plan for this removal action, and had expressed concerns regarding the proposed sampling depth of 3.5 feet. While the plan has been modified, RWQCB staff still have concerns regarding the ability of the proposed sampling plan to accomplish the sample collection objectives stated in the plan.

Location and depths of soil samples to be collected. The stated sample collection objectives are "to assess the dispersion of TPH contamination." As discussed at several BCT meetings focusing on the vertical extent of contamination, contamination from hydrocarbon releases has been observed at depths that appear to be below the lowest stand of the water table. The mechanisms leading to such occurrences are not known, but could include presence at times past of free product (which, if present, would result in depression of the water table), lower stands of the water table in drought cycles compared to the current wet cycle, and subsidence of the island. As a result, to adequately characterize the petroleum hydrocarbon distribution in the subsurface, the sampling procedures must include full characterization of petroleum hydrocarbon vertical extent. This should be based at a minimum on completion of borings to depths at which no visual evidence of staining or field instrumentation indicates the presence of petroleum hydrocarbons. Based on the available data from boring 12-HP196, borings may need to be completed to depths of 8' or more. At least one sample submitted for analysis should reflect the horizon judged to be most contaminated based on visual observations and field instrument readings. This sample may or may not correspond to a particular level of the water table as measured during this field investigation.

Sampling procedures. The sampling procedures indicate that a sample from hand augered holes will be collected at depths of 6-12 inches below ground surface. Please describe how this sample will meet the sample collection objectives.

California Environmental Protection Agency

Please submit a revised Section 1.0 of the Sampling Plan (4 pages of text) by the close of business on Friday, March 12, 1999. Thank you very much for your cooperation.

If you have any questions regarding this letter, please call me at 510-622-2377.

Sincerely,



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

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