

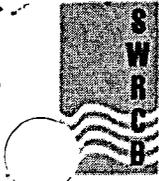
California Regional Water Quality Control Board

San Francisco Bay Region



Gray Davis
Governor

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Winston H. Hickox
Secretary for
Environmental
Protection

March 16, 1999
File: 2169.6013

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

Re: **Comments on Draft Field Sampling and Analysis Plan for Additional Sampling at Corrective Action Plan Sites, Naval Station Treasure Island, San Francisco, California (dated January 7, 1999)**

Dear Mr. Galang:

Thank you for the opportunity to review the above-referenced document. Comments from the Regional Water Quality Control Board (RWQCB), San Francisco Bay Region are presented as an attachment to this letter.

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

Sincerely,

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

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Attachment

cc: Mr. James A. Ricks, Jr. (SFD-8-2)
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Regional Water Quality Control Board Comments on Draft Field Sampling and Analysis Plan for Additional Sampling at Corrective Action Plan Sites 04/19, 06, 14/22, 15, 16, 20, and 25, Naval Station Treasure Island, San Francisco, California (March 2, 1999)

GENERAL COMMENTS

1. For a number of AOCs described in this plan, the proposed sampling and analysis plan is not adequate to characterize the vertical extent of hydrocarbons in soil. The specific comments outline modifications to the plans for these AOCs necessary for the plans to be approved by the RWQCB.
2. The specific comments address areas where the field sampling and analysis plans require additional modification before the plans can be approved. For those areas not specifically mentioned in the specific comments, the field sampling and analysis plans are approved as submitted.

SPECIFIC COMMENTS

1. Site 04/19, AOC 04/19-S2. The boring proposed at the location of the previous hydraulic punch 04/19-HP004 should extend to a depth which fully delineates the vertical extent of hydrocarbons. Visual or field instrumentation cues may aid in making this delineation. For each of the borings, soil samples submitted for laboratory analysis shall represent at a minimum the most contaminated zone encountered.
2. Site 04/19, AOC 04/19-S4. At each of the five borings proposed for this AOC, the boring shall be advanced to a depth which fully delineates the vertical extent of hydrocarbons. Visual or field instrumentation cues may aid in making this delineation. At a minimum, in addition to the soil samples proposed for laboratory analysis at 5' and 7.5', a soil sample from a depth of 10' shall be submitted for analysis.
3. Section 3.2.2, paragraph 2. The statement that samples collected below the water table reflect groundwater contamination and not soil contamination must be supported with an analysis. The analysis shall include at a minimum calculations based on generally accepted principles of equilibrium partitioning of the distribution of petroleum hydrocarbons between solid and liquid phases in saturated soils.
4. Site 06, AOC 06-S4. At each of the eleven borings proposed for this AOC, the boring shall be advanced to a depth depth which fully delineates the vertical extent of hydrocarbons. Visual or field instrumentation cues may aid in making this delineation. At least one soil sample from each boring shall be submitted for laboratory analysis from a horizon interpreted to be at a depth greater than the estimated vertical extent of contamination.
5. Site 06, AOC 06-S6. At each of the borings A, B, C, D, and G proposed for this AOC, the boring shall be advanced to a depth which fully delineates the vertical extent of hydrocarbons. Visual or field instrumentation cues may aid in making this

delineation. At least one soil sample from each boring shall be submitted for laboratory analysis from a horizon interpreted to be at a depth greater than the estimated vertical extent of contamination.

6. Site 14/22, AOC 14/22-S1 and AOC 14/22-S4. Review of boring logs from previous investigations indicates staining, odor, or elevated field instrument readings at depth in an area defined on the north by 14-MW02, on the west by 14-HP030, 14-HP032, 14-SB01, and 22-HP013, on the south by 22-SB03, and on the east in most cases by those locations closest to San Francisco Bay. The sampling plan for these AOCs shall be modified to include borings at or near the former locations of AST 4, AST 456, UST 85, south of ASTs 6A-6G, and at or near the locations of previous borings 14-HP019, -HP020, -HP-021, -MW01, and MW02. At each of the borings completed as part of this FSAP at these AOCs, the boring shall be advanced to a depth which fully delineates the vertical extent of hydrocarbons. Visual or field instrumentation cues may aid in making this delineation. For all borings, soil samples shall be submitted for laboratory analysis from depths of 5', 7.5', 10', and 12.5'. At least one soil sample from each boring shall be submitted for laboratory analysis from a horizon interpreted to be at a depth greater than the estimated vertical extent of contamination.
7. Section 3.4, Site 15. Please describe how the results of the Navy SCAPS field investigations were used in developing the sampling plan for this site.
8. Site 15, AOC 15-S3. At the location of the proposed well, soil samples shall be collected at depths of 5', 7.5,' and 10' and submitted for laboratory analysis. The boring shall extend to a depth which fully delineates the vertical extent of hydrocarbons. Visual or field instrumentation cues may aid in making this delineation. At least one soil sample from the boring shall be submitted for laboratory analysis from a horizon interpreted to be at a depth greater than the estimated vertical extent of contamination.
9. Site 15, AOCs 15-S4 and 15-S5. At the proposed boring locations, soil samples shall be collected at depths of 1', 4', 5.5', 7.5,' and 10' and submitted for laboratory analysis. The borings shall extend to a depth which fully delineates the vertical extent of hydrocarbons. Visual or field instrumentation cues may aid in making this delineation. At least one soil sample from each boring shall be submitted for laboratory analysis from a horizon interpreted to be at a depth greater than the estimated vertical extent of contamination.
10. Site 20, AOC 20-S4 and Potential AOC 20-1. At each of the borings proposed for these AOCs, the boring shall be advanced to a depth which fully delineates the vertical extent of hydrocarbons. Visual or field instrumentation cues may aid in making this delineation. At the proposed boring locations, soil samples also shall be collected at depths of 7.5' and submitted for laboratory analysis. At least one soil sample from each boring shall be submitted for laboratory analysis from a horizon interpreted to be at a depth greater than the estimated vertical extent of contamination.

11. Section 3.7. Please present or describe the results of the sampling at the pre-RI locations shown on Figures 13 and 14.
12. Section 3.7.1. A monitoring well should be installed at a location upgradient of Well 25-MW02.
13. Section 3.7.2. Review of boring logs from previous investigations indicates staining, odor, or elevated field instrument readings at depth in an area defined by 25-HP021, 25-HP020 and San Francisco Bay. The sampling plan for this AOC shall be modified to include borings at or near the locations of previous borings 25-HP012, -HP013, HP016, -HP020, and -HP-021. At each of the borings completed as part of this FSAP at this AOC, the boring shall be advanced to a depth which fully delineates the vertical extent of hydrocarbons. Visual or field instrumentation cues may aid in making this delineation. For all borings, soil samples shall be submitted for laboratory analysis from depths of 5', 7.5', and 10'. At least one soil sample from each boring shall be submitted for laboratory analysis from a horizon interpreted to be at a depth greater than the estimated vertical extent of contamination.