



# California Regional Water Quality Control Board

## San Francisco Bay Region



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TREASURE ISLAND  
SSIC NO. 5090.3.A

Gray Davis  
Governor

May 24, 1999  
File No. 2169.6013 (DFL)

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

**Regional Water Quality Control Board, San Francisco Bay Region, Comments on the Draft Final Remedial Investigation Offshore Sediments Operable Unit Report, Naval Station Treasure Island, San Francisco, California, dated March 19, 1999.**

Dear Mr. Galang:

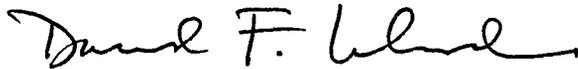
Thank you for the opportunity to review the above-referenced document. San Francisco Bay Regional Water Quality Control Board (RWQCB) comments are presented below.

Response to Comment 9. The text proposed in the response for addition to Chapter 6 does not appear to have been added to the sections noted.

Response to Comment 10. We continue to be concerned that the use of the reference site maximum leads to an underestimate of the potential for impacts associated with copper. The response states that the reference site maximum represents a regional concentration. The Regional Monitoring Program measures dissolved copper concentrations. Results for 1995, for example, indicate that dissolved copper concentrations in the Central Bay ranged up to about 2.5 ppb, a value close to the acute AWQC and well below the reference site value. In addition, detections of copper in porewater occur in all but one sample from Area C and in all the Area D samples, at concentrations ranging from 29 to 53 ppb. Copper was not detected or was detected sporadically in other areas. These results suggest something different is occurring in Areas C and D. While the range of copper HQs is not affected by the use of the reference site maximum, the number of samples for which nonzero HQs are calculated is sharply reduced, and may under represent impacts associated with copper. The Navy should provide additional data to support the use of the reference site maximum as a surrogate for ambient conditions. Alternatively, the Navy should use an alternative value to assess the significance of porewater concentrations of copper, perhaps using the RMP dissolved copper concentrations.

Thank you very much for your cooperation. If you have any questions regarding these comments, please call me at 510-622-2377.

Sincerely,



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

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California Environmental Protection Agency