



California Regional Water Quality Control Board

San Francisco Bay Region

N60028_001050
TREASURE ISLAND
SSIC NO. 5090.3.A



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Governor

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July 27, 1999
File: 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

Re: Comments on Draft Additional Characterization of Total Petroleum Hydrocarbons, Site 12 – Old Bunker Area, Leachate Field Studies, Technical Memorandum, Naval Station Treasure Island, San Francisco, California (dated June 25, 1999)

Dear Mr. Galang:

Thank you for the opportunity to review the above-referenced document. The Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) has the following comments on the report:

GENERAL COMMENTS

1. The lack of petroleum hydrocarbon analyses on the soil samples used to generate the leachate is a significant source of uncertainty in the calculation of leaching factors.
2. It has recently come to our attention that leachate concentrations developed using the SPLP are not equivalent to pore-water concentrations in the original soil matrix. A recommended procedure for converting leachate concentrations to pore-water concentrations is described in Odermatt and Menatti (1996), Methodology for Using Contaminated Soil Leachability Testing to Determine Soil Cleanup Levels at Contaminated Petroleum Underground Storage Tank (UST) Sites, Journal of Soil Contamination 5(2): 157-169. Once pore-water concentrations are calculated, they could then be compared to water quality criteria or used in estimating leachate factors.
3. The absence of soil TPH data from the same samples used for the leachate tests makes these results useful qualitatively at best. The estimation of soil concentrations corresponding to water quality criteria does not seem appropriate given the limited amount and quality of the available data, and given the uncertainties associated with the data.

SPECIFIC COMMENTS

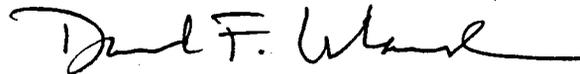
1. Page 8. The text notes fifteen leachate results. We could find only five reported in the technical memorandum.

Page 8, equation. See General Comment 2 above.

Mr. Ernesto Galang
07/27/99

If you have any questions regarding this letter, please contact me by phone at 510-622-2377 or by email at dfi@rb2.swrcb.ca.gov.

Sincerely,



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

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