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Secretary for
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Protection

California Regional Water Quality Control Board San Francisco Bay Region

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TREASURE ISLAND
SSIC NO. 5090.3.A



Gray Davis
Governor

Date: December 20, 1999
File No. 2169.6013 (CRM)

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

Subject: Comments Regarding Additional Sampling Locations for the Former Storage Yard at Site 12, Naval Station Treasure Island, San Francisco

Dear Mr. Galang:

Regional Board staff (Board staff) has reviewed the scope of work for additional sampling locations at the Former Storage Yard. The scope of work was discussed with representatives of the Navy during a meeting on November 29, 1999, and was subsequently submitted to this office on December 16, 1999. The scope of work is consistent with our discussions during the meeting, and we concur with the sampling locations as proposed. We understand that the sampling was initiated on December 18, 1999.

For the record, we again are compelled to comment on language contained in the Navy's cover letter regarding the use of human health screening values (i.e., PRGs) to define the extent of soil contamination. The cover letter states, in part: ***"If the concentration of PCBs or SVOCs exceed the PRGs for residential soil in any of the proposed borings, samples will be collected at the contingent locations near the proposed locations where the elevated concentration was detected. The purpose of the contingent locations is to delineate the extent of contamination."***

The ***"extent of contamination"*** is not limited to PRG values, but rather the detected concentration of contaminants in the environment. While it may be appropriate to develop screening values for certain contaminants, using PRGs as default values may not be adequate to evaluate impacts to water quality. Considering the apparent heterogeneous nature of contaminants in the Former Storage Yard area, limiting the investigation solely based on PRG screening values may result in an incomplete assessment of the nature of contaminants. Furthermore, considering that significant concentrations of contaminants were detected near the ground water, monitoring wells will likely be necessary in this area.

Based on discussions during recent meetings, we understand that the Navy is aware of the need to fully assess the extent and nature of contaminants in the environment. The Navy has verbally committed to complete further assessment, as necessary, to address water quality issues. Because written documents submitted to the agencies by the Navy is part of the public record, we are compelled to provide a written response in cases where it appears that documents may be unclear to others regarding the investigation requirements of the agencies.

California Environmental Protection Agency

If you have questions regarding these comments, please feel free to call me at (510) 622-2377.

Sincerely,



Chris Maxwell
Associate Engineering Geologist
Ground Water Protection and Waste
Containment Division

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cc: Mr. James Ricks, Jr. (SFD-8-2)
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