

DISTRIBUTION  
EVALUATION OF PICKLING TANK  
EMERGENCY CONTAINMENT STRUCTURE  
NAVAL STATION, TREASURE ISLAND  
HUNTERS POINT ANNEX  
SAN FRANCISCO, CALIFORNIA  
January 29, 1988

|           |   |        |
|-----------|---|--------|
| 5 copies: | Western Division,<br>Naval Facilities Engineering Command<br>900 Commodore Drive<br>San Bruno, California | 1 - 5  |
|           | Attention: Mr. Alex Dong (Code 1146)  |        |
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LDS/DHP/ere/F2327

QUALITY CONTROL REVIEWER



Lisa S. Teague  
Geologist - 3839

## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

Phone: Area ( SSIC NO. 5090 3  
464-1255SAN FRANCISCO BAY REGION  
111 JACKSON STREET, ROOM 6040  
OAKLAND 94607January 29, 1988  
File No. 2169.6032(LF)Ric Notini  
Department of Health Services  
Toxic Substances Control Division  
2151 Berkeley Way, Annex 7  
Berkeley, CA 94704

Subject: Comments on Hunters Point Scoping Document

Dear Ric:

We have reviewed the Draft Scoping Document for the Remedial Investigation/Feasibility Studies at the Naval Station, Treasure Island, Hunters Point Annex, prepared by Harding Lawson Associates. We have also reviewed Preliminary Comments on Hunters Point Scoping Document prepared by staff of the Department of Health Services. These comments provide a good base for additional comments from the Regional Board staff, as we have no objections to the Department's assessment of the subject document.

In general, we believe that all sites where contaminants have been found at levels exceeding background levels should be studied to ascertain if these contaminants threaten beneficial uses of the surface or ground waters. This applies to known sites and those sites for which initial investigations are contemplated. Thus, we consider action levels for further study to be "natural background" for all Triple A sites, underground tank sites, MILCON sites, bay sediments, Study Area A and B, surface inventory sites, and the previously identified "IR" sites. Some examples at "IR" sites include the old transformer yard and the Building 503 site where it is appropriate for surface soils to be analyzed for PCB contamination to background levels, in this case the limits of detection. The basis for requiring remedial action on any site will be cost-effectiveness, technical feasibility, and risk assessments.

Of special concern in the subject document is the use of previous information developed by EMCON in their 1987 Confirmation Study, Verification Step. This document contained a reference to "Regulatory Criteria" supposedly stating action levels for cleanup acceptable to the Regional Board. This information was reproduced as Table 3 of Appendix A of the subject document. The information is neither technically correct nor relevant to the protection of beneficial uses of the waters of San Francisco Bay. I have already discussed this matter with Harding Lawson representatives and they have agreed with my assessment of the matter. I am requesting that the subject document delete Appendix A-Table 3, Appendix B-Table 2, and references to Appendix A-Table 3 contained on page 37—first paragraph and page 73—second paragraph. I am also requesting that Appendix E, Tables 3 and 5 be modified to omit the incomplete reference to "Regulatory Standards" as these only relate to hazardous waste designations and not to the protection of beneficial uses.

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We believe a thorough review is necessary of any previously completed sediment studies (i.e., EIS, dredging, etc.) in areas off-shore, especially adjacent to the bay fill area, the industrial landfill, the oil reclamation ponds, and the pickling and plate yard. These and additional off-shore areas should be sampled to determine the lateral and vertical extent of contamination above background levels in the sediments. Additionally, benthic studies should be proposed to determine the impact of this pollution on beneficial uses.

Monitoring wells proposed for water bearing zones should be designed to be screened and clustered in such a manner as to give a true vertical picture of the water quality conditions in the aquifer. This is especially important in water bearing zones greater than 20 feet thick.

Please incorporate our comments with yours so as to provide for one set of comments from our agencies on the subject document. Please contact me or William Hurley if there are any questions

Sincerely,



Lester Feldman,  
Cleanup Activities SL