

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
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December 12, 1990
File No. 2169.6032

Commanding Officer
Naval Station Treasure Island
Building I (code 70)
San Francisco, CA 94130-5000

Attention: Mr. Eddie Sarmineto

RE: Floating Product in Wells at IR-2, Oil Reclamation Ponds, Hunters Point Annex.

Dear Mr. Sarmiento:

On November 6, 1990, Tom Gandesbery of my staff, as well as representatives from State Department of Health Services and the US EPA, visited the Hunters Point Annex (HPA) to observe field activities and to discuss the progress of soil and groundwater investigations. They met with Mr. Richard Powell and other Navy representatives who accompanied them on inspections of the southeastern portion of the Annex including areas designated IR-1, IR-2, IR-3, IR-12. During discussions with Mr. Powell, it became evident that an oily floating material had recently been found in several of the wells at, or adjacent to the former "oil reclamation ponds" at IR-3. Mr. Powell said that the material has not been tested by the Navy's consultant but is believed to consist of waste oil from the former ponds. He stated that the thickness of the oil in one well was on the order of five or six feet. The thickness of oil in the well indicates that substantial quantities of floating oil maybe present in soils and floating on the shallow groundwater in this area.

Regional Board policy states that floating or "free" liquids must be removed immediately. Generally, the interim remediation of floating product should not be postponed until full soil and groundwater investigations are complete. Instead, interim removal of contaminated soil and floating product should take place concurrently with investigation of the vertical and lateral extent of groundwater pollution. The reasons for this approach are twofold: 1) floating product is considered to be an on-going source of dissolved-phase constituents; and 2) floating product removal systems are relatively inexpensive and can be easily installed. Additionally, in this case the wells are in close proximity to the Bay furthering our position that this material represents a threat to beneficial uses of the Bay.

Therefore, I recommend that the Navy immediately initiate further investigation of the nature and occurrence of the floating oil. This investigation should include, but need not be limited to bailing or pumping of product from monitoring wells; monitoring of product thickness over

time; and analytical testing of oil and water from the wells. Following the acquisition of this data, the Navy should propose an interim remedial strategy for abatement of floating product using active or passive technologies. Staff are of the opinion that these actions can be justified as an "emergency" measure or a "time-critical removal action" under Federal National Contingency Plan (NCP) guidelines.

Please contact Tom Gandesbery of my staff at (415) 464-0841 if you have questions or comments.

Sincerely,



Lester Feldman, Section Leader
Toxics Cleanup Division

cc: Louise Lew
Richard Powell
WESTDIV, Naval Engineering Command

Chuck Flippo (H-7-5), USEPA
Mark Malinowski, DHS,TSCP

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