

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**

SAN FRANCISCO BAY REGION

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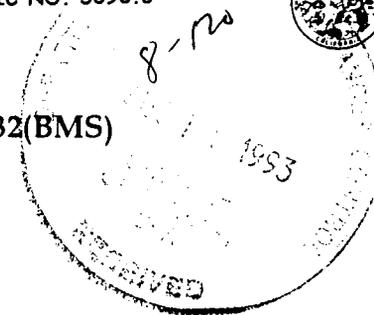
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August 6, 1992  
File No. 2169.6032(BMS)



Mr. Cyrus Shabahari  
Department of Toxic Substances Control  
700 Heinz Avenue, Blvd. F, Suite 200  
Berkeley, CA 94710

**Subject: Draft Treatability Study Work Plan Operable Unit 1, Site IR-3, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California, June 17, 1993.**

Dear Mr. Shabahari:

The staff of the San Francisco Bay Regional Water Quality Control Board has completed its review of the above document received in our office on June 23, 1993. Presented below are comments that should be considered.

**GENERAL**

1. Please provide additional information about the toxicity and biodegradability of the surfactants proposed to be used in the treatability study.
2. Some additional testing of San Francisco Bay surface water should be performed during the pilot scale stage to demonstrate that no adverse biological effects from thermal alteration or surfactant contamination occur.
3. Decisions about what the remedial goals of the technology should be made in consultation with the agencies. When will these remedial goals or "target residual oil concentration" be proposed?
4. If the proposed extraction technique proves feasible, will the cost estimates for remediation include extraction in combination with bioremediation or disposal options?

**SPECIFIC**

1. p. 10, Section 3: Since the ambient water temperatures in San Francisco Bay range between 12 and 15° C, and, therefore, the mass of oil/sludge might be expected to exhibit a similar range of temperatures, should one of the "control" tests be performed within this low temperature range?

2. p. 16, Section 3.3.2.3: Does the phrase "let stand" means "allowed to stand"?
3. p. 17, Section 3.4.1: What are "repacked" soil columns?
4. p. 21, Section 3.5.2: What measures will be taken to distinguish potential heavy metal contamination from carbon steel well casings decomposing in seawater from the potential contribution of heavy metals from the waste oil/sludges?
5. p. 22, Section 3.5.3.1: Is IR03MWO-3 tidally influenced? If so, how will this affect the proposed 15 foot screen length?
6. p. 23, Section 3.5.3.2:
  - 3) Was the use of Bay seawater as a diluent for the surfactant considered?
  - 7) Temperature of surface water of San Francisco Bay in the vicinity of the pilot test should be measured to verify that thermal effects of the test do not effect biota in the Bay.
  - 8) How is the surfactant concentration measured? Tests of the surface water should be performed to determine if surfactant from the tests is "leaking" out into the Bay.
7. p. 25, Section 3.5.5: What is the "target residual oil concentration"? Decisions about how much oil/sludge is left in the soil/sediment should be made in consultation with the agencies.

Please direct your questions to me at (510) 286-4222.

Sincerely



**Barbara M. Smith, Ph.D.**  
**Remedial Project Manager**