

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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April 8, 1994

File No. 2169.6032(BMS)



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

**Subject: Draft Parcel D Site Inspection Report, Naval Station Treasure Island,
Hunters Point Annex, San Francisco, California, February 22, 1994**

Dear Mr. Shabahari:

The staff of the San Francisco Bay Regional Water Quality Control Board (SFRWQCB) have completed their review of the above documents containing the results of the Site Inspection (SI) and the Remedial Investigation (RI) Workplan. Presented below are comments that should be addressed.

- ◆ Many of the Parcel D RI recommendations did not fall within the realm of RI work, but were housekeeping or removal action activities that would reduce the threat of contamination to groundwater and surface water quality. It was unclear how and when these tasks identified in the Parcel D SI report/RI workplan documentation would be implemented. A schedule for implementation of these important "housekeeping" activities should be provided by the Navy.
- ◆ The decision criteria for determining whether data indicate a "point source" or a "non-point source" release are unclear. Several instances of contamination above health based levels (HBLs), where contamination appeared to be isolated, are reported, yet the decision presented in the document is not to proceed from SI to RI level characterization. While this decision may be appropriate, it is important to indicate that a component of each decision to proceed to RI characterization is based on best professional judgement, rather than suggesting that only specific, limited criteria, such as HBLs, will be used.
- ◆ Demonstrated storm drain-sewer line interconnections present a potential threat to water quality at HPA. A concerted effort should be made to complete the separation of the storm drain and sewer systems before buildings connected to the affected portions of the lines are made available for interim use. A schedule for the investigation and field work to separate the storm drain-sewer line interconnections should be provided by the Navy.

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

Sincerely,

A handwritten signature in cursive script that reads "Barbara M. Smith".

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

Specific Comments

1. p. 18, Section 5.3.1.4: The storm drains in Parcel D appear to be in very poor condition, and pose a potentially significant threat to water quality, especially from contamination along the Morell Street and E Street side of Drydock 4, due to sandblast grit, and along the Hussey Street side of the Pickling and Plating Yard (IR-9 and Building 411) due to chromium (and other heavy metals) contamination. These threats to water quality are of particular concern since groundwater monitoring wells in IR-9 and IR-8 were demonstrated to be tidally influenced. It is important to develop a strategy for addressing areas of known contamination with significant threats to water quality, such as storm drain sediments, using removal actions, excavations, or repair and housekeeping approaches, rather than waiting for the ROD to initiate action.
2. p. 24, Section 5.3.2.5: Typo?: Workplan for PA-50 shown on Plate 21.
3. p. 32, Section 6.3.2: Please add a statement that indicates that data from the radiologic investigations will be provided in the RI report.
4. p. 41, Section 6.6.3.3: It is unclear how the decision was made that the data from PA30MW07A indicated a "nonpoint source release" of heptachlor in the groundwater. Please provide the rationale. Please note that the measured concentration of heptachlor (.13 $\mu\text{g/L}$) exceeds the saltwater aquatic life criterion (.0036 $\mu\text{g/L}$) by two orders of magnitude.
5. p. 47, Section 6.11.4: It is unclear how the results from one boring in the RI phase will confirm or deny the presence of antimony at PA-16 when nine sites within PA-16 showed elevated concentrations of this inorganic analyte. If there is additional interpretation of chemical analytical data that led to some suspicion that the data was invalid, that information should be stated in the text as the cause for resampling. Is it possible that munitions may have been stored in this area? Has radiologic screening been performed here? Could there be some other reason for the presence of antimony at this site?