

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

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Mr. Stephen Chao
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Department of the Navy
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Bldg. 101
San Bruno, CA 94066-0720

October 22, 1992
File No. 2189.8009

Subject: Comments on the Additional Sites Investigation Report
Draft, September 11, 1992

Dear Mr. Chao:

The following comments are based on the San Francisco Bay Regional Water Quality Control Board staff's review of the Additional Sites Investigation Report Draft.

General Comments:

The State action level for TPH of 100 ppm referenced from the LUFT Field Manual, 1989, refers to the total TPH of all hydrocarbon chains within a sample or borehole. It is not appropriate to select out specific species of TPH to determine if the concentrations exceed the State's action levels.

The San Francisco Bay Regional Water Quality Control Board's action limit for BTEX in soils is 1 ppm total BTEX. Therefore, the highest concentrations of BTEX found in the Golf Course Landfill, boring SBGC-4, would be of concern at this site.

Acetone was detected at all sites, and though this may be a laboratory contaminant, it seems as though there are concentrations which exceed the normal range expected from laboratory methods and conditions; for example the 2,100 ppb acetone found in the Golf Course Landfill. There is no mention of any method blank contamination to support dismissing the higher levels of acetone found. In each group of samples there seems to be at least one acetone hit which is higher than the range of lower concentrations of 10-75 ppb.

Specific Comments:

pg. 22, section 4.1 TPH concentrations should be evaluated as the total TPH within a borehole or sample, therefore it is inaccurate to state that only the TPH-kerosene is a concern at the site.

pg. 23, section 4.2 The fact that TPH was found in Patrol Road ditch at only 130 ppm does not necessarily mean that it is not a

contaminant of concern. More information concerning the method blank is needed to make that statement. What were the concentrations of TPH in the method blank? What is meant by "corresponding" blank? Was only one performed on a daily basis?

pg. 24, section 4.3 Detected concentrations of ethylbenzene, toluene, and xylene do exceed the RWQCB's action limits of 1 ppm total BTEX in soils.

pg. 27, section 5.2.1 The explanation for acetone and 2-butanone in the listed samples needs to be clarified. What are the implications of these data being "estimated"? How does it affect the way the data is being evaluated?

pg. 28 section 5.2.4 What was the concentration of TPH-motor oil in the method blank contamination? When was the method blank run?

pg. 31 section 6.0 Future soil samples at Zook Road should be analyzed as close to the saturated zone as possible, as well as areas which are screened to indicate the highest contamination. This will give a better indication of the impact to the groundwater at the site.

pg. 32 section 6.0 The ecological risk of the PCB's migrating through the groundwater and seeping into adjacent channels or ditches should also be evaluated in a future document.

If you have any questions or concerns, please call me at the San Francisco Bay Regional Water Quality Control Board, at (510) 286-3980.

Sincerely,


Elizabeth J. Adams
Project Manager

cc: Mr. Cyrus Shabahari, DTSC
Ms. Roberta Blank, US EPA, H-9-2