

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

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December 9, 1993
File No: 2119.1057 (GK)

Lou Ocampo
WESTDIV
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-2402

SUBJECT: COMMENTS ON THE NAVAL FUEL DEPOT POINT MOLATE SHORELINE/LANDFILL INVESTIGATIONS AND QUARTERLY GROUNDWATER SAMPLING DRAFT FIELD WORK PLAN/SAMPLING ANALYSIS PLAN, dated November 3, 1993

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Dear Mr. Ocampo,

The following comments are based on the San Francisco Bay Regional Water Quality Control Board staff's review of the Naval Fuel Depot Point Molate Shoreline/Landfill Investigations and Quarterly Groundwater Sampling Draft Field Work Plan/Sampling Analysis Plan, dated November 3, 1993.

General Comments:

1. The San Francisco Bay Regional Water Quality Control (RWQCB) staff would like to be notified and/or on-site when field activities are scheduled.
2. According to the State Water Resources Control Board Resolution No. 88-63 "Sources of Drinking Water", all surface and groundwaters of the State are considered suitable, or potentially suitable for municipal or domestic water supply unless: (1) Total dissolved solids (TDS) exceed 3,000 mg/l or (2) The water source does not provide sufficient water to supply a single well capable of producing an average, sustained yield of 200 gallons per day. If the groundwater is declared as a potable water supply based on the TDS and yield, the quantitation limits need to be equal or lower than drinking water standards to enable future comparisons. If the groundwater is declared as not a potable water supply due to high TDS it is an indication that the groundwater maybe in communication with the San Francisco Bay. Therefore, the quantitation limits need to be equal or lower than the water quality standards established for protection of the beneficial uses of the Bay.

In general, quantitation limits should be set so as to enable comparison with the criteria contained in the following documents.

- Federal and State Maximum Contaminant Levels
State and Regional Board Basin Plans
RWQCB Basin Plan Water Quality Objectives
RWQCB Basin Plan Effluent Levels
California Enclosed Bays and Estuaries Plan (salt water)
- NOAA Sediment Toxicity Levels
RWQCB Sediment Quality Criteria
EPA Water Quality Criteria

The concentrations in these criteria have been established for protection of water or sediment quality, aquatic life, human health, or other environmental receptors. Data analyzed and reported with quantitation limits above these concentrations will not provide conclusive information for making the regulatory decisions during all phases of investigation and cleanup.

3. The RWQCB does concur with the transects drawn on Plate 1 as potential sediment sampling locations but the sediment sampling protocol described in this draft workplan is inadequate. A scoping meeting is needed to discuss how to approach the sediment issue at Point Molate Fuel Depot.

Specific Comments:

4. Page 16, 2nd paragraph: If there is a possible migration pathway for contaminants through the bay mud (as described) and it impacts both the bay mud and the colluvium layer (layer below bay mud), how will this migration pathway be addressed when designing the trench? Has the significance of this migration pathway been evaluated?
5. Page 22, 4th Paragraph: Although the groundwater and soil data collected during this CTO can be used to evaluate a no further action recommendation, it should not be the intent of this investigation to focus on this option. If there a potential threat to groundwater, remedial alternatives will be evaluated.
6. Page 26, 2nd Paragraph: The purpose of the near-shore sediment sampling is to determine the level of contamination and potential impacts to the Bay.

Which transects on drawn on Plate 1 represent sediment sampling locations for determining ambient sediment values?

7. Page 26, 4.2 Task 3 - Landfill Investigation: The beneficial uses of the groundwater at the landfill must be determined. The selection of remedial alternatives will be based on those that are protective of the beneficial uses (see comment 2).

What is the rationale behind proposing the 2 sampling locations? Are two samples enough to determine the actual boundaries of the soil and groundwater contamination? What evidence is there to support the current boundaries of the landfill illustrated in Plate 1 (e.g. geologic evidence)? How is it known that the boundary parallel to the San Francisco Bay shoreline does not extend closer to the shoreline?

Also, when analyzing groundwater and soil from the landfill site the full suite of analytes including VOCs, SVOCs, pesticides/PCBs, metals, BTEX, and TPH should be targeted.

8. Page 30, 2nd Paragraph: The RWQCB staff requests to review and approve which wells are selected for the groundwater monitoring network.
9. Page 30, Quarterly Groundwater Sampling: Quarterly Groundwater Reports should be generated after each sampling event and submitted to the RWQCB within 30 days after the sampling event.
10. Page 31 & 32, Table 5 & 6: Turbidity should be added to the analysis column and should be measured in the field. Total Dissolved Solids (TDS) is another parameter that should be measured before quarterly sampling begins (see comment 2).
11. Page 38, 1st paragraph: What disposal and treatment options are proposed for the investigation derived wastes?
13. Page 47, 5.5.1 Groundwater sampling Procedures: For metals analysis of groundwater, the RWQCB requests that both an unfiltered and filtered sample be analyzed.
14. Page 47, 3rd paragraph, Section (2): If an immiscible phase is detected when would a sample of the product not be required?
15. Page 49, 1st paragraph: Before compounds are removed as target analytes the RWQCB should concur with the removal decision. Four quarters of "non-detect" of a compound are required before the compound can be removed as a target analyte. However the compound will have to be tested for annually to confirm non-recurrence.
16. Page 57, Containers: If bubbles are present in the VOA bottle after capping it, the RWQCB requests a new sample be taken. The cap should not be removed once in place to add more liquid.
18. Page 60, Analytical Protocol and Procedures: The quantitation limits used for analysis must be lower or equal to the water quality criteria values. The water quality criteria values are dependant on the beneficial uses of the groundwater. See

comment 2.

17. page 63, 5th paragraph: Will the RWQCB receive a copy of the Interim Report so that we can be aware of the progress and status of the investigation and aid in recognizing any data gaps?

If you have any questions or comments I can be reached at the San Francisco Bay Regional Water Quality Control Board at (510) 286-4267.

Sincerely,



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Project Manager

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