



California Regional Water Quality Control Board

San Francisco Bay Region



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Arnold Schwarzenegger
Governor

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NFD POINT MOLATE
SSIC NO. 5090.3.A

Date: APR 26 2004
File No. 2119.1057 (AVC)

Southwest Division
Naval Facilities Engineering Command
Attn: Mr. Michael Bloom
BRAC Environmental Coordinator
1230 Columbia Street, Suite 1100
San Diego, CA 92101

Subject: Comments on the Navy's "Response to Comments for the Draft Feasibility Study Installation Restoration Site 1 at Naval Fuel Depot, Point Molate, Richmond, California,"

Dear Mr. Bloom:

Thank you for the "Response to Comments for the Draft Feasibility Study (FS) Installation Restoration (IR) Site 1 at Naval Fuel Depot (NFD) Point Molate Richmond, California" prepared by Sulliva/TtEMI and received by the San Francisco Bay Regional Water Quality Control Board (Water Board) on March 31, 2004.

After a thorough review of the Navy's responses to comments (RTCs), Water Board's staff provides additional comments to the following issues:

- The Navy's RTC no. 2 specifies, "*The seep collection drain was installed to intercept the intermittent surface water seep (SW02-04) located downgradient of the landfill toe. Therefore, SW02-04 was replaced by the seep collection drain. This drain collects groundwater across the entire toe of the landfill, diverts it through the OWS, and discharges it into the wetlands.*" Please also evaluate the option of discharging downgradient of the wetland, without affecting the wetland wildlife.
- The RTC no. 3 proposes the following modification to the text: "...after the five year review required by CERCLA, the waste will no longer pose a threat to water quality and monitoring at Site 1 would no longer be required (Tetra Tech 2002a)." The Water Board staff interpretation of this sentence is that the remaining waste will not pose a threat to water quality, after five-year review required by CERCLA. At the time of this FS, this is speculative as there is no data to support the assumption that the waste will/will not pose a threat to water quality. Water Board staff needs to advise that monitoring extended beyond the 5-year period may have to be performed to confirm that

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the waste no longer poses a threat to water quality and that the proposed UST program corrective action, up-gradient of the landfill is successful.

- RTC no. 4 could be revised after considering the Water Board recommendation for discharge down-gradient of the wetland and a new site conceptual model (SCM) could be presented.
- Water Board staff does not concur with the Navy's RTC no. 6(a) excluding Chapter 3 of the San Francisco Bay Water Quality Control Plan (Basin Plan) as a potential ARAR based on a limited interpretation of the Site 1 conditions that the discharge is only to wetlands. Looking at the SCM, the seep that is feeding the wetland is first groundwater at this site, discharging to the wetlands as a surface water, and from the wetland is migrating back again to the groundwater, and so on. The narrative water quality objectives established by the Basin Plan and presented in Chapter 3 are applicable ARARs. The reason for this is that the leachate poses a potential threat to the groundwater so that the water quality standards promulgated in the Basin Plan are used to develop a groundwater monitoring plan. The groundwater monitoring program will evaluate whether there is a statistically significant increase over **background levels** for any waste constituent. Water quality protection standards, based on the California Toxics Rule and the Basin Plan may be considered to determine the appropriate action if a release (contamination above background) is detected.

In addition, pursuant to the Porter-Cologne Act, the Basin Plan establishes beneficial uses of groundwater and surface water for the San Francisco Bay Region. At the time of this letter, a Technical Memorandum presenting the beneficial uses of groundwater at Point Molate was not presented to the Water Board and no Water Board concurrence with such document was provided. The Basin Plan establishes beneficial uses of groundwater and surface water, as well as narrative objectives for protecting beneficial uses. It is only an academic exercise to discuss now this issue without an approved beneficial use for the groundwater at Point Molate project.

Don't hesitate to call me at (510) 622-2353 or E-mail to avc@rb2.swrcb.ca.gov if you would like to discuss this letter or any other issues relating to NFD Point Molate clean up.

Sincerely,



Adriana Constantinescu, RG
Project Manager – Point Molate

cc: Mr. Duane Rollefson, RPM
Mr. Craig Murray, City of Richmond
Mr. Don Gosney, Community Chairperson, Point Molate RAB

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