

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

April 16, 1996



Commanding Officer
Engineering Field Activity West
Attn: Code 18, Mr. Ernesto Galang
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-5006

**COMMENTS TO BENCH SCALE SOIL BIOREMEDIATION TREATABILITY STUDY
DRAFT WORK PLAN DATED 15 March, 1996**

Dear Mr. Galang:

The Department of Toxic Substances Control (Department) has received the above document for our review and comment. From our discussion during the April 15, 1996 Remedial Project Managers' meeting, the Navy had indicated that this study is specifically designed for sites contaminated by petroleum products only. As you know, petroleum products are excluded from the definition of "Hazardous Substances" under chapter 6.8 of the California Health and Safety Code. Sites contaminated by petroleum products only do not fall into Department's purview. The Navy, with regulatory agencies' concurrence, is in the process of breaking out the "petroleum only" sites from its RI/FS program and incorporates them into the Underground Storage Tank (UST) Compliance program. We, therefore, recommend you change the title of this document to "Bench Scale Soil Bioremediation Treatability Study for Petroleum only sites" and defer our review and comment for this particular document to the San Francisco Bay Regional Water Quality Control Board.

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If you have any questions regarding this letter, please contact me at (510) 540-3822.

Sincerely,



Chein Ping Kao, P.E.
Senior Hazardous Substances
Engineer
Office of Military Facilities

cc: Ms. Gina Kathuria
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San Francisco Bay Region
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