



Pete Wilson
Governor



San Francisco
Bay Regional
Water Quality
Control Board

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March 30, 1998
File: 2169.6013

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402
Attention: Mr. Ernesto Galang

Re: Characterization of Intrinsic Biodegradation Potential, Status, and Rates at Treasure Island, San Francisco

Dear Mr. Galang:

In Appendix F of the Draft Corrective Action Plan dated November 17, 1997, the Navy notes that natural biological attenuation of petroleum hydrocarbons in soil and groundwater may already be occurring at Treasure Island. Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) staff commented on the Draft CAP that this statement needs to be supported with site-specific data documenting soil and groundwater conditions that show biological degradation potential and activity. This letter is sent to reinforce the importance of collecting site-specific data to address this point. An adequate dataset will be critical to the ability of the RWQCB to evaluate Navy proposals to consider natural attenuation as part of corrective actions at CAP and UST sites, or as part of remedial actions at CERCLA sites where petroleum hydrocarbons are also present.

The RWQCB requests that the Navy integrate measurement of biological degradation parameters into the upcoming April groundwater monitoring event, which we understand will be a coordinated event including the CERCLA sites, CAP sites, and 8 UST sites. The Navy should collect data sufficient to document biodegradation potential, status, and rates. We further request that the Navy document its response to this request in the responses to the Draft CAP and the Interim Groundwater Monitoring Field Sampling Plan Addendum dated January 15, 1998, and that the Addendum be revised to reflect any modifications to the plan addressing this request.



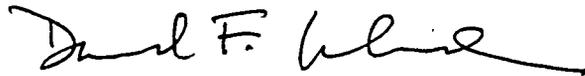
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If you have any questions regarding this letter, please call me at 510-286-4267.

Sincerely,



David F. Leland, P.E.
Groundwater Protection and Waste
Containment Division

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cc: Mr. John Pfister
Engineering Field Activity West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402

Mr. James A. Ricks, Jr. (SFD-8-2)
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Mr. David Rist
Department of Toxic Substances Control
Northern California Region
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Mr. James B. Sullivan
Caretaker Site Office
Treasure Island
410 Palm Avenue, Room 161
San Francisco, CA 94130-0410

Ms. Martha Walters
San Francisco Redevelopment Agency
770 Golden Gate Avenue
San Francisco, CA 94102

Richard Knapp, JtEM1
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