



California Regional Water Quality Control Board

San Francisco Bay Region



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TREASURE ISLAND
SSIC NO. 5090.3.A

June 3, 1999
File No. 2169.6013 (DFL)

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

Re: Comments on Groundwater Status Report, Summary of Groundwater Monitoring from January to November 1998, Naval Station Treasure Island, San Francisco, California (dated May 7, 1999)

Dear Mr. Galang:

Thank you for the opportunity to review the above-referenced document. Comments from the Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) are presented as an attachment to this letter.

If you have any questions regarding this letter, please call me at 510-622-2377.

Sincerely,

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

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Attachment

cc: 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

California Environmental Protection Agency

Mr. James B. Sullivan
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**Regional Water Quality Control Board Comments on Draft Annual
Groundwater Monitoring Status Report for 1998, Naval Station Treasure
Island, San Francisco, California (May 7, 1999)**

GENERAL COMMENTS

1. The sampling protocol discussion notes that silica gel cleanup removes polar breakdown products of petroleum hydrocarbon degradation. The RWQCB is concerned that removal of these breakdown products from samples may underestimate TPH concentrations. This may be of concern if the polar breakdown products exhibit toxicity to aquatic receptors. Could the Navy provide some references regarding the characteristics of these breakdown products with respect to aquatic toxicity?

SPECIFIC COMMENTS

1. Section 5.2. The text notes that Well 06-MW03 has historically contained floating product. The removal of free product is a high priority for the RWQCB. As has been discussed for other locations where free product has been encountered (e.g., several areas along the former fuel line alignments), the Navy should present a plan for free product removal at Site 6.
2. Section 7.4.1. The text notes that free product has been observed at the UST 270 site. As has been discussed for other locations where free product has been encountered (e.g., several areas along the former fuel line alignments), the Navy should present a plan for free product removal at this site.
3. Section 7.5. The text notes that the Navy will give water level measurement and potentiometric contour mapping at this site additional attention in 1999. Please describe how the Navy plans to address this issue. It would seem that including wells installed at UST Site 270 could help in this regard.
4. Section 9, Site 14. As currently defined, the groundwater monitoring program does not include wells located in the areas that have historically shown the higher concentrations of petroleum hydrocarbons at this site. The RWQCB requests that Wells 14-CW02 and 14-CW03 be included in the monitoring program and that these wells be sampled for chemical analysis.
5. Section 11.4. The sampling dates noted are for 1995-96. Are these correct?
6. Section 11.4. The 1998 monitoring results show significant differences between the May and November events. These suggest that direct comparisons between Spring 1996 data and Fall 1998 data may not adequately account for concentration differences associated with seasonal or

other factors. Seasonal variations in chemical concentrations should be considered in the interpretation and presentation of these data.

7. Sections 11.4.3 and 11.4.4. In the former section, the text suggests that the highest DCE concentrations were observed in Well 21-MW03, while the latter section states that the highest concentrations were observed in Well 21-MW02. Please clarify.
8. Section 11.4.4. The chlorinated solvent plume discussion should integrate the results for vinyl chloride.
9. Figure 11-6. The 1995 data contour is labeled as 1,2-DCE. Should this be PCE?
10. Figures 12-6, 12-8, 12-10, and 12-12. The areal isoconcentration maps show 100 ug/L contours in the deep zone that are not represented on the cross section. On the one hand, it appears that the contours shown on the areal maps would appear on the cross section. On the other hand, it does not appear that any concentrations above 100 ug/L were measured in the deep zone wells in November 1998. In any case, the presentations should be consistent with one another. Also, the plan location of the cross section shown in the inset of Figure 12-12 has been displaced southward of the actual location of the section.
11. Section 13.4.1. RWQCB staff were not aware that a technology demonstration has been proposed for Site 25. The Navy should submit a plan for review of this demonstration prior to implementation. We are particularly concerned that the demonstration is proposed immediately upgradient of Well 25-MW02, the sole Site 25 monitoring point in the area of concern. Is the Navy proposing to replace this well with a well situated nearby in an area that would not be affected by the technology demonstration?