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Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## San Francisco Bay Region

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Gray Davis  
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TREASURE ISLAND  
SSIC NO. 5090.3.A

Date: August 10, 1999  
File No. 2169.6013 (DFL)

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

### Re: RWQCB Comments on Field Sampling Plan Addendum for Additional Characterization of Total Petroleum Hydrocarbons at Site 12

Dear Mr. Galang:

Thank you for the opportunity to review the above-referenced document received on August 5, 1999. Because of the high level of interest on the part of the City of San Francisco in the near-term reuse of the housing units on Site 12, Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) staff have agreed to review this field sampling plan addendum on an expedited basis. RWQCB staff have the following comments on the plan:

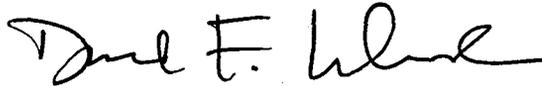
1. Page 3. The statement that no VOCs or SVOCs were detected in the samples collected by IT in June is incorrect. If the statement was intended to say that no VOCs or SVOCs were detected at concentrations that may pose a risk to human health, support for this statement should be presented; we are not aware that this finding has been made previously or documented.
2. Page 3, second paragraph. As has been discussed in recent meetings, it is the position of the RWQCB that corrective action at this site must address protection of human health and the environment. Corrective actions may consist of institutional controls or similar mechanisms. The wording of this paragraph should be revised accordingly.
3. Section 5.0. 1) Borings should be logged so as to clearly delineate the vertical extent of staining. We presume from the Navy's proposal to collect and submit only one sample for analysis that the Navy intends to use staining as a surrogate indicator of the vertical extent of contamination. 2) The RWQCB requests the analysis of the first round of groundwater samples for VOCs and SVOCs.
4. Additional Characterization Tasks. 1) After the two new wells are installed, and in conjunction with sampling activities, the Navy should collect groundwater samples in such a manner and at such times that the influence of tidal fluxes on groundwater conditions, including flow directions, is minimal. In coordination with water sampling, water levels should be measured at all of the wells installed near Buildings 1311 and 1313. Water levels should be measured simultaneously in all the wells installed near Buildings 1311 and 131 prior to the initiation of sampling at any of the wells. 2) The Navy should describe the purpose, construction, and operation of the lift station. This description should include whether the lift station is used for sanitary or storm drain discharges, the configuration of any subsurface

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structures at the lift station, the locations of any associated piping, current pumping cycles of the lift station, historical pumping at the lift station, any evidence of groundwater infiltration into the pumping station or associated piping, and any other information pertinent to developing an understanding of the relationship of the pumping station to groundwater conditions.

Should you have any questions regarding these comments, please contact me by telephone at 510-622-2377 or by email at [df1@rb2.swrcb.ca.gov](mailto:df1@rb2.swrcb.ca.gov).

Sincerely,



David F. Leland, P.E.  
Associate Water Resources Control Engineer  
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