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Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## San Francisco Bay Region

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TREASURE ISLAND  
SSIC NO. 5090.3.A



Gray Davis  
Governor

Date: October 13, 1999  
File No. 2169.6013 (CRM)

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

**Subject: Draft Field Sampling Plans for Site 12 at Treasure Island in the Vicinity of the Former Storage Yard and Mariner Drive (Buildings 1202, 1217, 1228, and 1230)**

Dear Mr. Galang:

Regional Board staff (Board staff) has reviewed the two above-referenced Draft Field Sampling Plans. Board staff has the following comments:

### General

We understand that the purpose of the proposed field investigations is to focus on the potential human health hazards associated with likely former debris disposal areas and a former storage area at Site 12. Board staff does not concur with the statement that no further investigation will be required if PRGs for human health are not exceeded. Board staff raised this issue during our working meeting on October 5, 1999. We understand that the Navy does not wish to incorporate water quality concerns into this phase of the investigation. Additional field investigation may be required at a later date to assess possible impacts to water quality associated with various constituents of concern.

Board staff believes that data could be simply and reasonably collected during this field investigation to assist in the evaluation of possible water quality impacts associated with debris and/or contaminated soil. These data are critical considering that previous investigations of debris disposal areas at Site 12 indicate that debris is prevalent below the ground water table. Board staff suggests that the Navy include contaminant leachability analysis into the proposed scope of work. Select soil samples could be analyzed for contaminant leachability using standard laboratory analysis methods. To provide realistic leachability data, de-ionized water could be used as the extractant rather than the standard citric or acetic acids. The leachability analysis data would greatly assist in the quantification of possible future impacts to water quality associated with various constituents of concern (COC) including petroleum hydrocarbons, metals, polychlorinated biphenyl (PCBs), pesticides, semi-volatile organics, and volatile organics.

Board staff is aware that the Navy previously attempted to evaluate the leachability of petroleum hydrocarbons in soil at Site 12 (June 25, 1999 – Leachate Field Studies, Technical Memorandum, Draft). Unfortunately, soil samples collected during the previous investigation were only analyzed for leachability. As indicated in Board staff's July 27, 1999 response comments, the study results are "qualitative at best" because the leachability results could not be compared against total petroleum hydrocarbon analysis. To evaluate possible water quality impacts associated with debris and contaminated soil, the Navy will eventually need to accurately assess contaminant leachability. The proposed field investigations provide an opportunity for the Navy to assess the leachability of several COC using both total and leachability analyses for select samples.

### Mariner Drive

Field methods proposed for evaluation of soil samples include odor and PID readings. The draft plan indicates samples that exhibit "significant" odor and/or PID readings will be submitted for laboratory analysis for semi-volatile organics, volatile organics, pesticides and PCBs. How does the Navy intend to qualify the meaning of "significant"? Considering that direct olfactory evaluation of samples is likely inappropriate in consideration of health and safety issues, how does the Navy intend to characterize odor?

If you have questions regarding these comments, please feel free to call me at (510) 622-2377.

Sincerely,



Chris Maxwell  
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