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# California Regional Water Quality Control Board

## San Francisco Bay Region



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TREASURE ISLAND  
SSIC NO. 5090.3.A

Date: October 22, 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: Regional Board Staff Comments Regarding Proposed Monitored Natural Attenuation for Petroleum Hydrocarbons in the Vicinity of Buildings 1311 and 1313 at Site 12, Treasure Island, San Francisco, California**

### Introduction

On October 19, 1999 Regional Board staff (Board staff) received a letter report from your office proposing monitored natural attenuation (MNA) for petroleum hydrocarbons in soil and ground water in the vicinity of Buildings 1311/1313 at Site 12, Treasure Island. For the reasons discussed in this letter below, Board staff can not concur with the proposal at this time.

The letter report also includes information to address issues raised by Board staff regarding arsenic in ground water in the vicinity of Buildings 1311/1313, and the potential for petroleum hydrocarbons to be present in lift station water. Board staff concurs that the data included in the letter report adequately demonstrates the absence of petroleum hydrocarbons in the lift station water. No further sampling is required at this time to evaluate the lift station water. The issue of arsenic in the ground water should be addressed separately as part of the Remedial Investigation and Feasibility Study (RI/FS) for Site 12, and Board staff is not providing comments at this time.

Board staff understands that the Navy is pursuing a remedial decision for this area to facilitate the lease and/or transfer of facilities at Site 12 to the City of San Francisco. It should be noted that remedial decisions are not considered final until the remedial decision documents for Site 12 are agreed upon and signed by the regulatory agencies. As such, any lease and transfer agreements based on remedial decisions that are made prior to approval of the remedial decision documents are potentially subject to change. Changes may occur for numerous reasons, including data that was not available when the preliminary remedial decision was made.

### Plume Delineation

The letter report includes data recently collected by the IT Corporation to assess the feasibility of excavation as a remedial action. These data indicate the presence of petroleum hydrocarbons in

soil below the water table north and west of Building 1310, and east and west of Building 1313. These locations are hydrologically upgradient of locations with existing ground water monitoring wells. Ground water data will be necessary in the area of Buildings 1310 and 1313 (i.e., maximum concentrations) to fully assess the fate and transport of contaminants, and to estimate the time required for natural attenuation processes to achieve the required cleanup goals.

### **Cleanup Goals and Point of Compliance**

The chosen remedial strategy must be capable of achieving the cleanup goals. Board staff concurs with the finding of the letter report that the ground water cleanup goal for total petroleum hydrocarbons in ground water is 1.4 mg/L, and that the point of compliance is the monitoring well(s) closest to the shoreline. This cleanup goal and point of compliance only applies to Site 12, and does not set precedent for other areas of Treasure Island. For the area of Site 12 in question, the point of compliance monitoring wells are 12-MW05, 12-MW23, and 12-MW22.

Based on the data included in the letter report, Board staff concurs that the ground water cleanup goal for petroleum hydrocarbons is not currently being exceeded at the point of compliance. As such, to support the MNA proposal, the Navy must only demonstrate that the remaining soil and ground water contaminants will not cause the cleanup goal to be exceeded in the future. MNA may be appropriate if the Navy can demonstrate that natural remedial processes are effective in achieving the cleanup goals for petroleum hydrocarbons in both soil and ground water. Issues involving arsenic in ground water should be addressed separately in the RI/FS.

### **Leachability and Fate and Transport**

The Navy previously submitted draft documents regarding the leachability and fate and transport of petroleum hydrocarbons at Site 12. The MNA proposal makes reference to and relies upon the conclusions of these documents. Board staff has submitted written comments to the Navy regarding these documents, and the Navy has yet to provide responses to comments and/or revised documents. It is not appropriate to cite documents as the technical basis for remedial decisions when the documents have yet to be approved by the agencies.

### **Referenced Biodegradation Data**

The letter report makes reference to ground water data that demonstrates active biodegradation of petroleum hydrocarbons in the area of Buildings 1311/1313. These data are not included with the letter report. Future reports regarding this issue should either include all referenced data, or clearly indicate the report(s) where the data has been previously published.

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

Sincerely,



Chris Maxwell  
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Ground Water Protection and Waste  
Containment Division

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