



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

San Francisco Bay Region

Internet Address: <http://www.swrcb.ca.gov>
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 FAX (510) 622-2460

N60028_001097
TREASURE ISLAND
SSIC NO. 5090.3.A



Gray Davis
Governor

Date: January 20, 2000
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: Comments Regarding Pilot Phase Field Sampling Plan for Potential Debris Disposal Areas at Site 12, Naval Station Treasure Island, San Francisco

Dear Mr. Galang:

Introduction

Regional Board staff (Board staff) has reviewed the above-referenced document, dated November 19, 1999. We recognize that this work plan focuses on assessing risk to human receptors, and does not necessarily address water quality and ecological issues that potentially may be associated with the debris disposal areas. As such, we are primarily deferring to the DTSC for comments on this work plan. To the degree that Board staff has been involved in the development of this work plan through the Base Closure Team, the following comments are intended to assist in the Navy in development and implementation of the final work plan.

Use of Lead as a Surrogate

We support the Navy's efforts to identify a chemical surrogate for the debris disposal areas. If a single chemical contaminant can be used to identify and characterize the variability and risk associated with the debris, then there may be significant cost savings for the Navy in the laboratory analysis. Unfortunately, the above-referenced plan fails to adequately support using lead as the surrogate. Although the plan provides data to support the variability in the concentrations of lead at the debris disposal areas, there is no evidence to demonstrate that lead is collocated with other constituents of concern (COC).

A disposal history model for the debris areas may support using lead as a surrogate for other metals. The primary sources of metals such as lead, copper, and zinc are likely burn ash and sand blast grit. This simple assumption would need to be supported by existing laboratory analytical data. However, there are likely other sources for the semi-volatile organic contaminants (SVOCs) and polychlorinated biphenyls (PCBs). While all of the detected contaminants would theoretically be associated with debris, the variable sources suggest that contaminants would not necessarily be collocated within the debris. Thus, using lead as the surrogate for all contaminants may not be adequate to characterize variability and risk associated with the debris disposal areas.

Polychlorinated Biphenyls (PCBs)

The plan does not identify PCBs as a constituent of concern (COC) for the debris disposal areas. Data collected during recent investigations in the debris disposal areas indicate the presence of PCBs in locations of debris. In some cases, the concentrations of PCBs have been elevated above Preliminary Remediation Goals (PRGs). We suggest that PCBs be added as a COC, and also be considered in the analysis of possible surrogates and collocation of contaminants.

Methane Generation

We concur with a statement made on page 20 of the pilot phase work plan that methane has not been detected inside of structures near the debris disposal areas. However, we do not concur with the statement that *"the debris does not appear to be a viable source for continuing methane generation."* Methane sampling conducted from debris in one disposal area indicates concentrations of methane greater than 30 percent by volume. Furthermore, limited methane sampling has been conducted in the debris areas at Site 12. No data has been collected to support the statement that methane generation will not continue at the location where methane was detected, or at other locations where debris has been found and methane sampling has not been conducted.

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

Sincerely,



Chris Maxwell
Associate Engineering Geologist
Ground Water Protection and Waste
Containment Division

cc: Mr. James 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

Nathan Brennan
Pat Nelson
Dale Smith
Peter Kiel
ARC Ecology
Anju Wicke (T&EM1)
Gary Foote (Geomatrix)
Michael Bloom (SWDIV)
Admin Record File (3 copies)

} RAB