

STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Alan D. Friedman)  
MEETING DATE: JUNE 12, 2013

**ITEM:** 5B

**SUBJECT:** Pacific Rod and Gun Club and the City and County of San Francisco, San Francisco Public Utilities Commission, City and County of San Francisco - Revised Site Cleanup Requirements and Rescission of Order No. 94-017

**CHRONOLOGY:** January 1994 –Site Cleanup Requirements issued

**DISCUSSION:** The Pacific Rod and Gun Club operates skeet and trap ranges at Lake Merced where shotguns are used to shoot pellets at clay targets. In the past, lead pellets from shotguns were discharged toward Lake Merced, but, pursuant to the Board's 1994 site cleanup requirements (SCRs), steel shot is now used. Prior to 2000, clay targets containing polycyclic aromatic hydrocarbons (PAHs) were used but have been replaced with biodegradable targets. The Club has operated its facility at its current location at Lake Merced since 1934, on property owned by the City and County of San Francisco. The San Francisco Public Utilities Commission is the City agency that oversees Lake Merced.

The Club's facility poses a potential risk to human health associated with exposure to lead and PAHs in the upland soils at the facility and a potential risk to aquatic organisms due to lead in the offshore sediments. The Board's 1994 SCRs required the cessation of the use of lead shot. This has been satisfied and the 1994 SCRs can be rescinded. The Revised Tentative Order requires additional remedial actions for meeting human health standards in upland soils and further investigation and evaluation of potential risks to ecological receptors in lake sediments. Depending upon the results of the ecological risk assessment, remediation may be required in lake sediments.

We received comments from the Club and the City (Appendix B) on the tentative order initially circulated for public comment. Our responses (Appendix B) address those comments. In addition to making minor edits and formatting changes, we revised the tentative order as appropriate in response to the comments. However, we understand that the Club still has concerns that it may raise at the Board meeting.

**RECOMMEN-  
DATION:** Adoption of the Revised Tentative Order (Appendix A)

**FILE NO.:** CIWQS Place ID 247266

**APPENDICES:** A. Revised Tentative Order  
B. Board Staff Response  
C. Comment Letters