

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

TENTATIVE ORDER

**RESCISSION OF SITE CLEANUP REQUIREMENTS (ORDER No. R2-2003-0080) for:
UNITED STATES DEPARTMENT OF DEFENSE, DEPARTMENT OF THE ARMY;
UNITED STATES DEPARTMENT OF THE INTERIOR, NATIONAL PARK SERVICE; and
THE PRESIDIO TRUST**

for the property located at:

THE PRESIDIO OF SAN FRANCISCO
SAN FRANCISCO, SAN FRANCISCO COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Regional Water Board), finds that:

1. **Site Description and History:** For 150 years until 1994, the Presidio of San Francisco (herein, the Presidio) was a Department of the Army (Army) installation and served as a mobilization and departure point during several overseas conflicts, a medical debarkation center, and the coastal defense for the San Francisco Bay Area. Industrial operations formerly performed at the Presidio were associated with the military's maintenance and repair of vehicles, aircraft, and base facilities. The Presidio also contains former landfills used by the Army for the disposal of fill soils and construction debris. In 1994, the Presidio was transferred to the National Park Service (NPS) and became part of the Golden Gate National Recreation Area. In 1996, Congress established the Presidio Trust (Trust), a federal government corporation responsible for managing the inland areas of the Presidio and converting it to a financially self-sufficient national park site.

2. **Summary of Investigation and Remediation Activities:** The primary contaminants at the Presidio are total petroleum hydrocarbons (TPH, including gasoline, diesel, fuel oil, and motor oil), gasoline constituents (benzene, toluene, ethylbenzene, and total xylenes or BTEX), petroleum solvents (Stoddard solvent), fuel oxygenates (methyl tertiary butyl ether or MTBE), and polycyclic aromatic hydrocarbons (PAHs). Site investigations to delineate the nature and extent of contamination included borehole drilling, soil and groundwater collection and analysis, passive soil gas surveys, installation of monitoring wells and groundwater sampling, geophysical surveys, and excavation of test pits. Based on site investigation activities, contaminant releases at the Presidio were due to past surface spills, former aboveground storage tanks (ASTs), underground storage tanks (USTs), and fuel distribution system (FDS) pipelines.

Approximately 575 tanks and 66 FDS pipeline segments have been removed at the Presidio along with about 100,000 tons of contaminated soil. In addition, remediation has included soil vapor extraction, groundwater extraction, in-situ bioremediation, thermal remediation, and natural attenuation.

3. **Regulatory History:** The Regional Water Board adopted revised site cleanup requirements for the Presidio on August 20, 2003 (Order No. R2-2003-0080). The purpose of the order was to update prior orders for the Presidio (Order Nos. 91-082 and 96-070) by identifying the current responsible parties (Army, NPS, and Trust); establish a schedule for corrective actions; and rescind the earlier orders.

In addition, Order No. R2-2003-0080 established cleanup standards based on the current and planned future uses for the Presidio for TPH, PAHs, MTBE, and lead. Soil cleanup levels were based on protection of human health (residential, park maintenance, and recreational uses), ecological receptors (terrestrial and aquatic), and water quality. Groundwater cleanup standards were based on protection of freshwater and saltwater ecological receptors and the beneficial use of groundwater as a potential source of drinking water.

4. **Basis for Rescission:** Rescission is appropriate because the tasks identified in Order No. R2-2003-0080 have been completed (Table 1). These tasks represent over 180 individual sites at the Presidio that have been evaluated and closed. All of these sites at the Presidio, with the exception of the Building 637 Area, have met the criteria outlined in the July 2009 assessment tool for closure of low-threat sites as discussed below. Residual contamination in the Building 637 Area is temporarily inaccessible and will be addressed in the future under a separate cost recovery agreement.
 - a. **Pollutant sources are identified and evaluated.** The Presidio's contaminants are TPH, gasoline constituents (BTEX), Stoddard solvent, MTBE, and PAHs. The contamination resulted from surface leaks and spills and releases from USTs, ASTs, and FDS pipeline segments during Army operations.
 - b. **The Presidio is adequately characterized.** The Presidio was characterized through a series of soil and groundwater investigations by the Army and the Trust. Hundreds of soil borings and 113 monitoring wells were installed, and hundreds of excavation confirmation samples were collected and analyzed. Site investigations adequately delineated the lateral and vertical extent of soil and groundwater contamination.
 - c. **Exposure pathways, receptors, and potential risks, threats, and other environmental concerns are identified and assessed.** Site specific exposure pathways have been assessed and nearby receptors have been identified. Based on these evaluations, impacts to surface water, wetlands, or other sensitive receptors are not likely.
 - d. **Pollutant sources are remediated to the extent feasible.** All known USTs and ASTs that are no longer in service have been removed. All known FDS pipeline segments have been removed or capped and abandoned in place. The Presidio's contaminants have been remediated by a combination of soil excavation and offsite disposal, soil vapor extraction, groundwater treatment and extraction, in-situ bioremediation, thermal remediation, and natural attenuation.

- e. **Unacceptable risks to human health, ecological health, and sensitive receptors, considering current and future land and water uses, are mitigated.** Residual soil and groundwater contamination does not pose unacceptable risk to human health or ecological receptors. Residual contamination does not exceed standards based on protection of human health (residential, park maintenance, and recreational uses) and ecological receptors (terrestrial and aquatic).
- f. **Unacceptable threats to groundwater and surface water resources, considering existing and potential beneficial uses, are mitigated.** No water wells, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted because residual contamination does not exceed standards for protection of drinking water, wetlands, and surface water beneficial uses. The Presidio Trust Management Plan (PTMP), which is the federal facility master plan, states that 80-85% of the Presidio's drinking water comes from Lobos Creek with the remaining 15-20% purchased from the San Francisco Public Utilities Commission. Although shallow groundwater beneath the Presidio is not currently used for drinking water, the Basin Plan identifies the entire basin underlying the Presidio as having potential beneficial use for municipal and domestic water supply.
- g. **Groundwater plumes are decreasing.** All groundwater plumes have been remediated. Approximately 20 years of groundwater monitoring indicate that chemical concentrations do not exceed California maximum contaminant levels (MCLs) for protection of drinking water or other applicable water quality objectives.
- h. **Cleanup standards can be met within a reasonable timeframe.** Soil and groundwater cleanup levels that are protective of public health and environmental resources have been met. Natural attenuation is expected to reduce any lingering contaminant concentrations in soil and shallow groundwater even further.
- i. **Risk management measures are appropriate, documented, and do not require further Regional Water Board oversight.** The Trust prepared the Land Use Control Master Reference Report (LUCMRR), dated September 2009, to serve as the implementation and enforcement plan to ensure that restrictions at the Presidio are maintained to protect public health and the environment. The LUCMRR identifies land use controls, such as restrictions on sensitive uses, the use of shallow groundwater, and requirements such as the implementation of a soil management plan that addresses appropriate health and safety measures in the event that subsurface activities are performed. Any change in the PTMP, such as the development of a groundwater supply, would require formal review under the National Environmental Policy Act. Further, the Trust would need to obtain a permit or modify its existing permit with the California Department of Public Health. These existing restrictions ensure that groundwater will not be used for drinking water without appropriate regulatory review and approval.

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In addition, the Trust developed a Petroleum Contingency Plan that establishes a process for reporting, investigating, and remediating previously unknown tanks or soil impacted with petroleum or related constituents that may be encountered as part of construction, maintenance, or other subsurface operations at the Presidio.

5. **CEQA:** This action rescinds an Order to enforce the laws and regulations administered by the Regional Water Board. Rescission of the Order is not a project as defined in the California Environmental Quality Act (CEQA). There is no possibility that the activity in question may have a significant effect on the environment. (Cal. Code Regs., tit. 14 §§ 15378 and 15061, subd. (b) (3).)
6. **Notification:** The Regional Water Board has notified the dischargers and all interested agencies and persons of its intent under California Water Code section 13304 to rescind site cleanup requirements for the discharge and has provided them with an opportunity to submit their written comments.
7. **Public Hearing:** The Regional Water Board, at a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, pursuant to section 13304 of the Water Code, that Order No. R2-2003-0080 is rescinded.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on May 14, 2014.

Bruce H. Wolfe
Executive Officer

Table 1. Summary of Completed Tasks from Board Order No. R2-2003-0080

Task in Order	Documentation of Compliance	Completion Date
1. Comprehensive petroleum investigation and remediation time schedule	<i>Comprehensive Petroleum Investigation and Remediation Time Schedule</i>	Nov. 21, 2003
	<i>Updated Comprehensive Petroleum Investigation and Remediation Time Schedule</i>	January 2008
2. Workplan for development of freshwater corridor surface water and sediment point of compliance concentrations	<i>Development of Freshwater TPH-diesel and TPH-fuel oil Point of Compliance Concentrations</i>	July 15, 2004
3. Report documenting the implementation of the freshwater corridor surface water and sediment point of compliance concentrations approach		
4. Interim remedial action work plan for Corrective Action Plan (CAP) sites	<i>Commissary Seeps Interim Source Removal Action Plan</i>	March 2001
	<i>Interim Action Plan, Building 1065 CAP Area</i>	July 2003
	<i>Interim Removal Action Work Plan, Removal of AST, Building 1349</i>	July 1995
5. Completion of interim remedial actions at CAP sites	<i>Interim Remedial Action for Building 231</i>	February 1992
	<i>Commissary Seeps Interim Source Removal Action Report</i>	January 2002
	<i>Completion Report, Phase I Interim Action, Building 1065 CAP Area</i>	July 2004
	<i>AST Closure Report, Building 1349</i>	May 1996
6. Proposed final CAP and cleanup standards at CAP sites	<i>Final Corrective Action Plan, Building 207/231 Area</i>	October 2007
	<i>Final Corrective Action Plan, Commissary/PX Study Area</i>	December 2005
	<i>Final Corrective Action Plan, Building 1065 Area</i>	January 2007
	<i>Final Corrective Action Plan for Building 1349 Study Area</i>	February 2006
	<i>Final Corrective Action Plan, Building 637 Area</i>	August 1999
7. Summary report and work plan for Mini-CAP sites	<i>Summary Additional Investigations, Mini-CAP Sites</i>	February 2003
	<i>Mini-CAP Site Review and Recommendations to Address Former Petroleum Tank Release Sites</i>	March 2004
	<i>Draft Final Site Investigation Work Plan Tank 1451.1, Mini-CAP Site</i>	May 2005

Table 1 (continued). Summary of Completed Tasks from Board Order No. R2-2003-0080

8. Completion of site investigation and remediation work plan at Mini-CAP sites	<i>Site Investigation Report, Tank 1451.1, Mini-CAP Site</i>	October 2005
	<i>Field Sampling Plan for Former Building 970</i>	May 2007
	<i>Mini-CAP Additional Investigations, Excavation, and Groundwater Monitoring Well Installations to Address Former Petroleum Release Site</i>	May 2007
9. Completion of final remedial actions at Mini-CAP sites	<i>Submittal of Information for Identified Geotracker Sites and Closure Request for Selected Tanks</i>	April 2009
	<i>Field Investigation Report and Closure Request for Former AST 970/Building 971 Area</i>	May 2011
10. Site status reports	<i>Site Status Report #1</i>	January 2004 (submitted semi-annually thereafter until 2008)
	<i>Presidio Trust Remediation Program Quarterly Program Status Report</i>	September 2008 (submitted quarterly thereafter)
11. Site-wide groundwater/surface water semi-annual monitoring reports	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2003</i>	October 2003 (submitted semi-annually thereafter)
12. Underground storage tank, aboveground storage tank, and fuel delivery system closure certification	Please refer to Tables 5a, 5b, 8, and 9 of the <i>Report Supporting Rescission of Water Board Order R2-2003-0080</i> dated February 2014	See Documentation of Compliance
13. Five-year status report	<i>Evaluation of Post-Remediation Groundwater Monitoring Results, Building 207/231 Area</i>	February 2014
	<i>Construction Completion Report, Building 207/231 Area</i>	January 2014
	<i>Correction Action Plan Implementation and Closure Report, Commissary PX Study Area</i>	November 2008
	<i>Revised Closure Request, Bldg. 1065 Area</i>	April 2011
	<i>Construction Completion Report, CAP Implementation, Bldg. 1065 Area</i>	March 2009
	<i>Groundwater Assessment and Request to Terminate Groundwater Monitoring of Well 1349MW100, CAP Area,</i>	October 2012

Table 1 (continued). Summary of Completed Tasks from Board Order No. R2-2003-0080

	<i>Building 1349</i>	
	<i>Corrective Action Implementation Report for the Bldg. 1349 Study Area</i>	March 2011
	<i>Building 637 Area Corrective Action Implementation Report</i>	February 2014
	<i>Bldg. 637 Area Completion Report</i>	March 2004
14. Low temperature thermal desorption (LTTD) soil tracking and management	<i>Low Temperature Thermal Desorption-Treated Soil Tracking and Management Plan</i>	November 2004
15. Lead cleanup value proposal	<i>Presidio-Wide Cleanup Levels for Soil, Sediment, Groundwater, and Surface Water</i>	October 2002
16. Contingency petroleum sites	<i>Petroleum Contingency Plan</i>	August 2004
17. Delayed compliance	<i>Request for Time Extension for Task on Presidio Petroleum Schedule, Site Cleanup Requirements</i>	December 2003
	<i>Request for Time Extension for Task on Presidio Petroleum Schedule, Bldg. 1065 Phase II Interim Action</i>	March 2004
	<i>Request for Time Extension for Task on Presidio Petroleum Schedule, Draft Commissary PX Corrective Action Plan</i>	April 2004
	<i>Request for Time Extension: Presidio Petroleum Schedule, Draft Bldg. 1349 Area Corrective Action Plan</i>	January 2005
	<i>Request for Time Extension on Construction Start Date, Commissary PX Site</i>	August 2005