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

MEETING DATE: January 10, 2018

ITEM: **5**

SUBJECT: **EXECUTIVE OFFICER'S REPORT**

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
SAN FRANCISCO BAY REGIONAL WATER QUALITY CONTROL BOARD

EXECUTIVE OFFICER'S REPORT: *January 2018*

A Monthly Report to the Board and Public

NEXT MEETING: January 10, 2018 **WEBSITE:** http://www.waterboards.ca.gov/sanfranciscobay/

Items in this Report (Author[s])

State Water Board Considering New Environmental Laboratory Accreditation Regulations (Jessica Watkins)

In July 2017, State Water Board staff released for public comment preliminary draft regulations that would establish new accreditation requirements for environmental laboratories in California. State Water Board staff will consider the comments received and revise the draft regulations as appropriate before publishing the official public notice that begins the formal comment period under the Administrative Procedures Act rulemaking process.

Perhaps the most contentious part of the proposed requirements is the decision to use The NELAC Institute (TNI) 2016 Standard to assess laboratories. The TNI 2016 Standard is the most prevalent standard used in the United States and is consistent with international standards for laboratory accreditation. It is intended to ensure that laboratory data are of known and documented quality and that data produced in laboratories using the standard is traceable and defensible for environmental and public health decisions. However, some stakeholders are concerned that implementing the standard could be onerous and cost-prohibitive, particularly for small laboratories.

The State's Environmental Laboratory Accreditation Program (ELAP) exists to ensure that environmental testing laboratories are competent to run analytical test methods to meet the requirements of the State's drinking water, wastewater, shellfish, food, and hazardous waste programs. All California environmental testing laboratories are required to obtain ELAP

accreditation prior to producing analytical data for California regulatory programs. The review of ELAP's laboratory standards began in 2014 after ELAP oversight moved from the California Department of Public Health to the State Water Board. The new management team called for an external, independent program review and convened an expert review panel. The panel published its recommendations in October 2015 and March 2017 and recommended that ELAP adopt the TNI 2016 Standard, establish an internal management system to hold staff and management accountable, update the list of analytical methods for which laboratories are accredited and assessed, secure the resources necessary to carry out its mission, and enhance stakeholder communication.

The State Water Board has committed to helping laboratories successfully comply with any new standard adopted. The State Water Board has contracted with a firm to train ELAP assessors and educate the laboratory community on the TNI 2016 Standard. In addition, the State Water Board is working on contracts to train small municipal and commercial laboratories and to provide two laboratories with free consultation on implementing the TNI 2016 Standard. As a condition, the two laboratories will be required to help their community implement the TNI 2016 Standard and learn from their experiences. We'll keep the Board updated on this issue.

Environmental Excellence Award for Bay Bridge Pier Implosion Demonstration Project (Derek Beauduy)

On December 12, the Federal Highway Administration awarded the Bay Bridge Pier E3 Demonstration Project with its 2017 Environmental Excellence Award. The Water Board was one of numerous agencies recognized for its role in the project and was called out for our collaborative permitting approach that allowed demolition of Pier E3 of the old East Span of the Bay Bridge using controlled implosion as a demonstration project. The Board's 2001 order that permitted Caltrans to construct the new East Span of the Bay Bridge also required Caltrans to demolish the old span in the least environmentally-impacting way possible. Monitoring of the demonstration project's effects on wildlife and water quality, completed by Caltrans during the controlled implosion of Pier E3 in the fall of 2015, was sufficient to convince us that it was less-impacting than other pier removal methods. Subsequent use of controlled implosion on other piers substantially reduced the time and expense needed to complete the demolition of the old span and reduced overall potential environmental impacts from the demolition. Demolition of the old span and its piers is now complete. Dale Bowyer and Derek Beauduy accepted the award in Sacramento on behalf of the Board.

Cleanup Continues at Navy Base Dry Cleaner Site (Katrina Kaiser)

Last month, Water Board staff signed an Interim Remedial Action Completion Report (I-RACR) for the former on-base dry cleaner at Treasure Island (Site 24, shown in Figure 1). The I-RACR documents implementation of the remedy for groundwater and soil gas that was selected in the Navy's 2015 Record of Decision (ROD). Site 24 is a 20-acre parcel where the Navy conducted dry cleaning operations from 1942 to 1977. Contaminants of Concern in groundwater and soil gas include volatile organic compounds including perchloroethylene (PCE) and its breakdown products trichloroethene, cis-1,2-dichloroethene, and vinyl chloride.

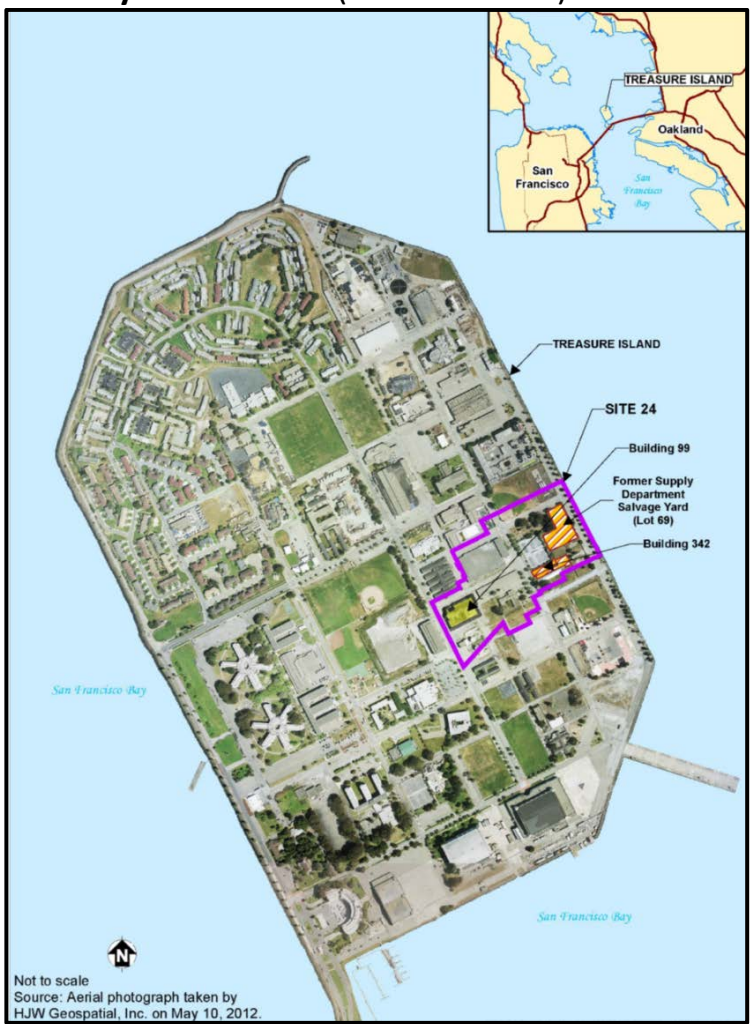

Figure 1. *Site 24 location at Treasure Island (purple outline)*

The ROD and selected remedy are included in the February 2016 Executive Officer's Monthly Report. The ROD identifies the following cleanup actions for the site:

- Excavate and dispose contaminated soil;
- Treat groundwater by injecting Zero-Valent Iron (ZVI) and in-situ bioremediation (ISB) stimulants; and
- Monitor groundwater and soil gas to document PCE breakdown, concentration reduction, and achievement of remedial goals.

Excavations took place at two source areas, Area 99A (inside Building 99) and Area 99B (outside building 99) (Figure 2). Twelve hundred cubic yards of soil were removed from these two areas. Groundwater treatment from September 2016 through February 2017 consisted of injecting microscale ZVI and an electron donor/substrate to promote ISB.

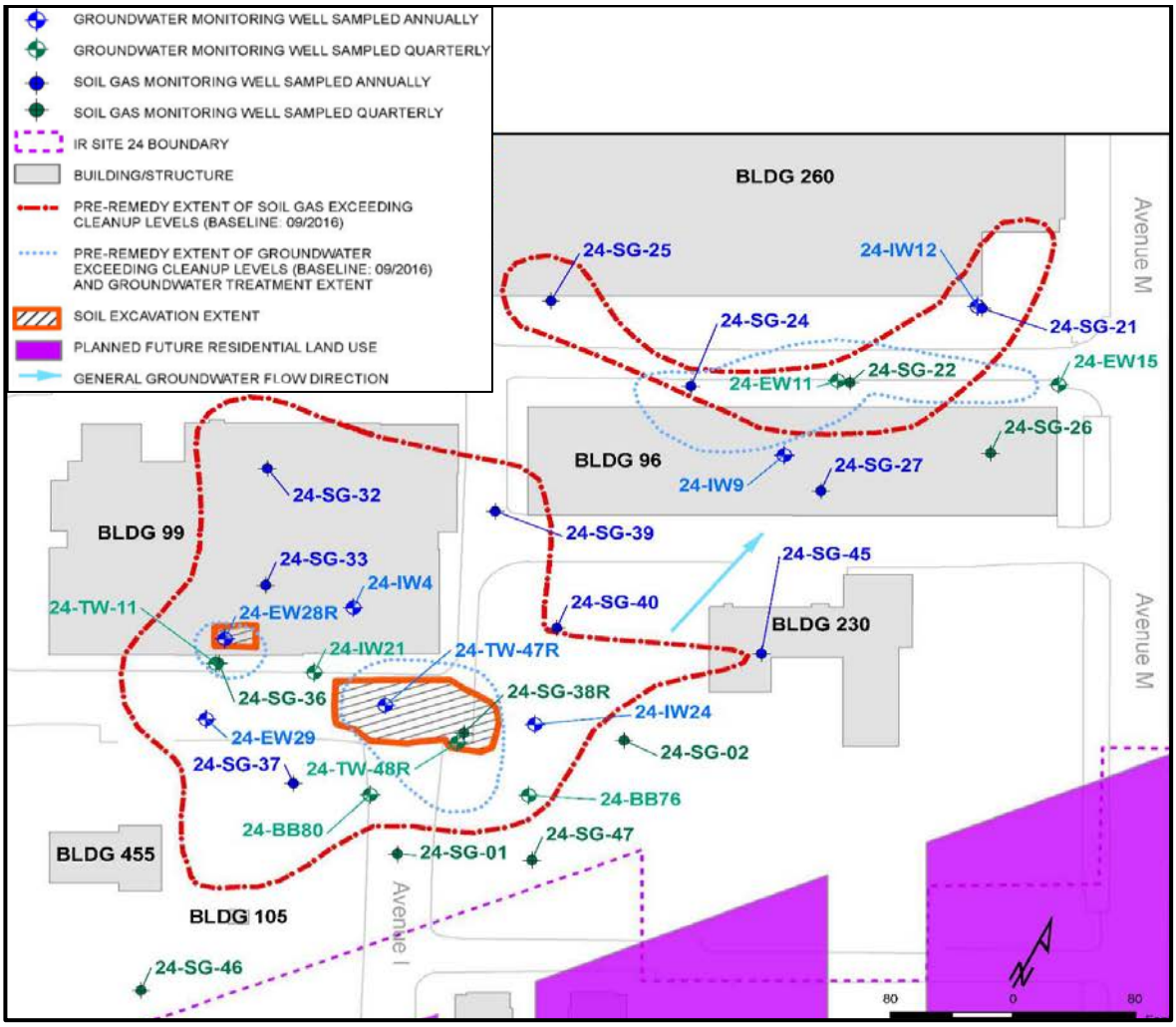

Figure 2. *Site 24 excavation areas and soil gas and groundwater plumes*

Contaminants of Concern concentrations exceeding groundwater cleanup levels were detected in three groundwater plumes (Figure 2). These plumes were designated as Areas 96 (Building 96), 99A and 99B. To remediate these plumes, a total of 74,000 pounds of ZVI was mixed with 5,000 gallons of ISB solution and was injected in 100 locations at Area 96, 14 locations at Area 99A, and 68 locations at Area 99B. Soil gas plumes are expected to decrease as the groundwater source areas are remediated.

Post-remediation monitoring is now in its second quarter. As of September 2017, two of the three groundwater and soil gas treatment areas have met cleanup goals. While more monitoring will be taking place over the next year, the latest results indicate that remediation goals can be met. If goals are not met by the time of the site's planned transfer to the City of San Francisco (planned for January 2019), the Navy will place institutional controls in the areas of the site where cleanup goals are not met. Groundwater remedial goals are protective of beneficial uses including aquatic habitat protection due to the site's proximity to the shoreline. Site 24 will be developed into mostly open space to be used for recreation and will be bordered on the southeastern side by residential properties.

Cleanup Orders Issued by Executive Officer (Stephen Hill)

The Board has delegated to the Executive Officer the authority to issue, amend, or rescind site cleanup orders pursuant to Water Code section 13304. The choice between having these orders acted upon by the Board or by the Executive Officer hinges on the degree of controversy and urgency in each case. In general, I issue, amend, or rescind these orders in situations where there is little or no controversy or when there is some urgency (e.g., cleanup action is needed promptly to address a current or imminent threat to human health or the environment). Otherwise, we bring these types of cleanup orders to the Board for its consideration and action in a public hearing.

In early December, I amended the 2014 site cleanup order for the Jones-Hamilton property located at 8400 Enterprise Drive in Newark. This former chemical plant property is one of the sites in the City of Newark's Dumbarton Transit-Oriented Development project. The 22-acre property has remained vacant for several years. It is now being cleaned up and will be redeveloped for residential use later this year. Last year, the developer completed removal of approximately 140,000 tons of contaminated soil and backfilled the site with clean fill. We previously amended the site cleanup order to update two cleanup levels and extend task deadlines due to redevelopment-related delays. The December amendment further revises task deadlines to accommodate the construction schedule. A draft of the amended order was circulated for public comment and no comments were received.

In mid-December, I rescinded the 1995 site cleanup order for the Chaboya Maintenance Yard property located at 2240 South Seventh Street in San Jose. The Santa Clara Valley Transportation Authority (SCVTA) has operated a bus washing, fueling, and maintenance facility at this site for several decades. In 1982, SCVTA discovered a leak of diesel fuel from piping at the fueling station; the leak resulted in significant soil and groundwater pollution. Pursuant to Board-issued cleanup orders, SCVTA carried out several cleanup actions including removal of underground tanks and piping, excavation of contaminated soil, and implementation of extraction wells and trenches to remove free product and diesel-impacted shallow groundwater. SCVTA also installed a slurry wall to prevent offsite migration of the contamination and placed a deed restriction on the property. As a result of these actions, groundwater contaminant levels have declined significantly and the site qualifies for low-threat closure pursuant to the State Water Board's underground storage tank policy. Our rescission order requires SCVTA to properly close monitoring and extraction wells, after which we will close the case.

In-house Training

Our next in-house training will cover effective negotiation and is scheduled for late January 2018. One brownbag seminar held this month included a presentation from Arcadis and CH2M Hill representatives on the natural attenuation process, called natural source zone depletion for light non-aqueous phase liquids, and its application at the Kinder Morgan Facility in Concord. A second brownbag seminar this month was a presentation on the relationship between dry cleaners and sewer lines, presented by Santa Clara Valley Water District staff. They focused on sewer line exfiltration of groundwater contaminants from drycleaners and the potential for production well detections. They presented results of a

study commissioned by the State Water Board in 2002, as well as more recent findings related to sewer line integrity and groundwater infiltration and exfiltration in contaminated areas. This presentation was helpful for caseworkers handling dry cleaner sites and nearby properties.

Enforcement Actions (Mary Boyd and Brian Thompson)

The following table shows the complaint issued since last month's report. In addition, proposed and settled actions are available on our website at:

http://www.waterboards.ca.gov/sanfranciscobay/public_notices/pending_enforcement.shtml

Complaint Issued - There will be a future opportunity to comment on a settlement or attend a public hearing regarding this case.		
Discharger	**Violation(s)**	**Proposed Penalty**
Isais Munoz	Operating an industrial facility without industrial stormwater permit coverage	$14,000

401 Water Quality Certification Applications Received (Abigail Smith)

The table below lists those applications received for Clean Water Act section 401 water quality certification from November 13 through December 7, 2017. A check mark in the right-hand column indicates a project with work that may be in BCDC jurisdiction.

Project Name	**City/Location**	**County**	**May have BCDC Jurisdiction**
Channel Improvements at Codornices Creek at Glen Avenue	Berkeley	Alameda	
Iron Horse Trail Extension at Scarlet Drive	Dublin		
Modifications of Six Bridge Structures at the I-680/State Route 4 Interchange	Concord	Contra Costa	
Culvert Extension on Pacheco Boulevard	Martinez		
Storm Water Bypass Channel at Americana Park	Pittsburg		
Contour Trail Rock Armor Fill Improvements	San Anselmo	Marin	
Site Improvements at 2319 Easton Drive	Burlingame	San Mateo	
Small Wetland Restoration Project	Foster City		✓
Bridge Deck Replacement on Dan Wilson Creek	Fairfield	Solano	
Levee Maintenance – Various Sites within the Sonoma Creek and Petaluma River Watersheds	San Pablo Bay National Wildlife Refuge	Sonoma	✓