
San Francisco Bay Regional Water Quality Control Board

January 24, 2020
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Presidio Trust
Attn. Ms. Nina Larssen
Remediation Program Manager
103 Montgomery Street
P.O. Box 29052
San Francisco, CA 94129-0052
Via email: nlarssen@presidiotrust.gov

Subject: **Water Board Review of the January 17, 2020 Revised Feasibility Study and Corrective Action Plan Report
Riley Avenue Site, Building Units 127A, 127B, and 128A
Fuel Distribution System Section BR11-1
Presidio of San Francisco, San Francisco, California**

Dear Ms. Larssen:

I reviewed the Presidio Trust's January 17, 2020 *Revised Feasibility Study and Corrective Action Plan* report (FS/CAP) for the subject Site. The FS/CAP presents the results of a feasibility study of corrective action alternatives to address Site contamination, and it identifies the preferred corrective action alternative. Based on my review, I concur with the FS/CAP.

BACKGROUND

Former Presidio Fuel Distribution System (FDS), Section BR11-1 is located on the west side of Riley Avenue in the Main Post Area of the Presidio of San Francisco. In May 2017, during maintenance work, the Trust discovered petroleum-contaminated soil in the basement of unoccupied residential unit 127B, immediately beneath and in contact with the foundation slab. Subsequent site investigations found petroleum contamination in soil, soil gas, and groundwater along the pipeline from the basement to the front yard of Unit 127B; in soil and soil gas along the pipeline from the basement to the front yard of Unit 127A; and in soil and soil gas along the pipeline beneath the basement slab of Unit 128A. The source of contamination was the leaking, abandoned-in-place, subsurface portion of the FDS BR11-1 pipeline that delivered fuel oil to the boilers of the three residences.

Criteria provided in the *Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA* (USEPA 1988) were used to screen various cleanup technologies and, based the screening results, three finalist CAP alternatives were retained for detailed analyses.

1. Alternative 1 – No Action.
2. Alternative 2 – Vapor Mitigation System (VMS) at 127B, Soil Capping, Groundwater Monitoring, and Institutional Controls (ICs).

- a. **Riley Avenue Unit 127B.** The installed VMS consists of the subslab venting system, vapor barrier, and new basement slab. The VMS mitigates soil vapor intrusion (VI) into Unit 127B. An integrated cap of the basement slab, existing exterior hardscape, and at least two feet of clean surface soil prevents exposure of residents and workers to contaminated subsurface soil. Groundwater will be monitored at existing monitoring well GW01 in the front yard.
- b. **Riley Avenue Unit 127A.** The existing basement slab mitigates VI into Unit 127A. An integrated cap of the basement slab, existing exterior hardscape, and at least two feet of clean surface soil prevents direct exposure to contaminated subsurface soil. Groundwater will be monitored at existing monitoring well GW03 in the back yard.
- c. **Riley Avenue Unit 128A.** The existing basement slab mitigates VI into Unit 128A, and it prevents direct exposure to the contaminated soil beneath it. Because subsurface contamination does not extend beyond the building footprint, no exterior cap is proposed. Groundwater will be monitored at existing monitoring well GW02 in the front yard.

Alternative 2 includes groundwater monitoring and ICs (annual cap inspection and maintenance and inter-occupancy indoor air sampling) for all three units.

3. Alternative 3 – Alternative 3 is equivalent to Alternative 2, except it includes “hot spot” removal of contaminated subsurface soil, including some free product, from the front yards of Units 127A and 127B.

Based on the results of the detailed analysis of the three finalist corrective action alternatives, Alternative 2 was selected as the preferred alternative. Alternative 2 was judged to be the most cost-effective. Although Alternative 3 would remove secondary source soil, it was found to provide limited risk reduction, because it would not eliminate the necessity of the VMS at 127B or the long-term ICs at Units 127A, 127B, and Unit 128A.

If you have any questions, contact me at (510) 622-2375 or at jeff.white@waterboards.ca.gov.

Sincerely,

Jeffrey D. White
Water Resource Control Engineer