



San Francisco Bay Regional Water Quality Control Board

June 8, 2022

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: No Further Action Required for Fuel Distribution System (FDS),
Section BR11-1, Presidio of San Francisco, San Francisco, California**

Dear Ms. Larssen:

Regional Water Board staff reviewed the December 7, 2021, October 2021 Semi-Annual Groundwater Monitoring Report and Request for Site Closure (report) for the subject site (site). This letter confirms that based on the available information, and with the provision that the information provided is accurate and representative of site conditions, site investigation and corrective actions are complete and no further action (NFA), including no further groundwater monitoring, is required for the site below:

Site Name	GeoTracker Case ID	Regional Water Board Case No.
FDS Section BR11-1	T10000001505	38D9327

Documents supporting this NFA determination are available at the State Water Board's GeoTracker database:

https://geotracker.waterboards.ca.gov/profile_report?global_id=T10000001505.

Basis and Assumptions

This NFA status applies only to releases of petroleum fuel and fuel constituents associated with the site. While the information provided indicates that the site meets standards consistent with residential use, we may reconsider these findings should new information be discovered regarding previously undetected contamination.

Residual petroleum contamination in soil, sub-slab/soil vapor, and groundwater remains at concentrations above applicable residential cleanup levels. Light nonaqueous phase liquid (LNAPL), or product, was observed in samples collected from boring SB010 at

JIM McGRATH, CHAIR | THOMAS MUMLEY, INTERIM EXECUTIVE OFFICER

depths from 17 to 25 feet, in the front yard of residence 127B. Also, in the front yard of residence 127B, there is petroleum contamination in groundwater exceeding the gross petroleum screening level at boring SB004 at a depth of 27 feet. On October 3, 2017, the concentration of total petroleum hydrocarbons as diesel (TPH-diesel) in groundwater at SB004 was 170,000 µg/L, and this concentration is indicative of petroleum product. **Importantly, the residual petroleum contamination in the front yard of residence 127B at SB004 and SB010 is limited in extent and does not appear to be mobile or migrating.**

In boring SB004 and the three monitoring wells, concentrations in groundwater of TPH-gasoline, TPH-diesel, TPH-motor oil, and/or TPH-bunker C exceeded the Regional Water Board's environmental screening levels (ESLs). However, the Regional Water Board evaluated laboratory-provided chromatograms for samples collected from these borings and wells. Our evaluation concluded that the TPH in groundwater is due to natural organic compounds and not from the petroleum fuel releases, except for the TPH in groundwater at/near boring SB004. Weathered LNAPL associated with the petroleum fuel release was indicated on the chromatogram for sample collected from boring SB004.

The extent of petroleum-contaminated groundwater is limited to the properties at 127A and 127B Riley Avenue (see report, Figure 3). The plume appears to be limited in extent and stable or decreasing.

Due to the presence of residual petroleum contaminants, shallow groundwater at residences 127A and 127B is not suitable for drinking water or other potential uses, such as landscape and garden irrigation, and should not be used without further assessment and mitigation of potential risks.

Conditions and Requirements

To ensure protection of public health, safety, and/or the environment, and to be consistent with the land and groundwater use assumptions above, the following conditions and requirements apply:

- No grading, excavation, or subsurface activities without a soil management plan: Any work involving soil excavation, trenching, or groundwater contact must be conducted pursuant to a soil management plan. The plan must include procedures for proper notification, handling, and disposal of any potentially contaminated soil or groundwater encountered during construction or removed from the site. Current and future site workers, tenants, and landowners must be notified of the soil management requirements for the property.
- Notify Regional Water Board – land use change: The Regional Water Board must be notified of any proposed changes in future land or groundwater use at the site. Formal Regional Water Board concurrence may be required.
- Decommission monitoring wells: Any monitoring wells that will no longer be used must be properly destroyed pursuant to requirements of the San Francisco

County Department of Public Works. Documentation of well destruction shall be submitted to the Regional Water Board.

Land Use Controls/Deed Restrictions

This NFA status would typically require a deed restriction to secure the above conditions and requirements necessary to protect public health, safety, or the environment. In this case, the Regional Water Board does not require a deed restriction because the Presidio Trust provides an equivalent degree of restriction through implementation of the Presidio Trust Management Plan (PTMP), which is the federal facility master plan for Area B, and its Land Use Controls Master Reference Report (LUCMRR).

The PTMP restricts the use of groundwater as a drinking water source. Lobos Creek provides approximately 85% of the Presidio's drinking water supply and the remaining amount is purchased from the City of San Francisco. A change in the PTMP, such as the development of a groundwater supply, would require formal review under the National Environmental Policy Act (NEPA). Further, the Presidio Trust would need to obtain a permit or modify its existing permit with the California Department of Public Health. Together, these existing requirements effectively restrict groundwater use without appropriate regulatory review and approval.

Site-Specific Land Use Controls

The April 28, 2020, Site-Specific Land Use Control Addendum to the LUCMRR (Site-Specific LUCMRR Addendum) describes the engineering and institutional controls that have been implemented to address residual petroleum contamination in soil, sub-slab/soil vapor, and groundwater at 127A, 127B, and 128A Riley Avenue. Those controls include a vapor mitigation system (VMS) at residence 127B; existing slabs, hardscapes, and vegetated landscapes at all three residences; and other land use controls.

The land use control (LUC) areas at the site include residences 127A, 127B, and 128A, located on the west side of Riley Avenue in the Presidio of San Francisco (Presidio). The extent of the LUC area for each residence includes the building footprint (basement and sunroom) and select exterior landscaped and hardscaped areas in the front yards of residences 127A and 127B. The location, extent, and coordinates of the LUC areas are presented on Figure 2 of the Site-Specific LUCMRR Addendum dated April 28, 2020.

The following site-specific land use restrictions and notifications apply within the LUC areas (as specified in the Site-Specific LUCMRR Addendum):

- Health & Safety Requirements - Personnel potentially exposed to soils in the Site LUC areas shall follow a site-specific Health and Safety Plan, have the appropriate level of health and safety training, and use the appropriate level of personal protective equipment specified in a Health and Safety Plan.

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- Soil Management Requirements - Soil excavated from the Site LUC areas shall be managed and/or disposed in accordance with Presidio policies and procedures and applicable federal, state, and local laws and regulations. Earthwork associated with any activity beyond general Operations and Maintenance (O&M) will be performed in accordance with the *Presidio Wide Soil Management Plan* or equivalent Site-Specific Soil Management Plan.
- Surface Cover Requirements - Contaminated soil in the Site LUC Areas shall remain covered with a minimum of two (2) feet of clean soil or covered with hardscape elements equivalent to existing conditions.
- Groundwater Restrictions - Use of groundwater and installation of wells for beneficial groundwater reuse (i.e., drinking, irrigation, or construction) at the Site are prohibited.
- Tenant Disclosure and Restrictions Requirements - Disclosure of the LUCs to tenants of residences 127A, 127B, and 128A and continued enforcement of prohibition on any construction, modification, repair, planting, ground disturbance, or installation in or around the premises by tenants.
- Projects involving building alterations or sub-surface work are required to go through the Presidio Trust building or dig permit process, respectively, which notifies and requires adherence by project proponents to LUC area restrictions and requirements. Dig permits are tracked and reported annually via the Presidio Annual O&M Report.
- Project proponent of future development will be notified of the presence of residual petroleum contamination, as part of the Trust's NEPA, National Historic Preservation Act, and dig permit processes.

Inspection, Maintenance, and Monitoring Requirements

Annual inspection, maintenance, and monitoring of the VMS and caps, and indoor air monitoring are presented in the June 22, 2020, Revised Operations, Monitoring, and Maintenance Plan (OMMP).

Activities completed as part of the OMMP, and the results of inspections, maintenance, and monitoring will be summarized in the Presidio Annual O&M Report submitted to Department of Toxic Substances Control (DTSC) and Regional Water Board during the first quarter of the following calendar year in conformance with the approved December 6, 2012, Operations & Maintenance Agreement. The Annual O&M Report documents Trust compliance with site-specific O&M plans and informs DTSC and Regional Water Board of changes to the OMMP or the Site-Specific LUCMRR Addendum.

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Closing

Attached please find the Site Closure Summary. Please contact Jeff White of my staff at jeff.white@waterboards.ca.gov if you have any questions regarding this matter.

Sincerely,

Lisa Horowitz McCann
Assistant Executive Officer

Attachment: Site Closure Summary

Email Distribution:

Isabella Roman, DTSC
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