
San Francisco Bay Regional Water Quality Control Board

August 24, 2020
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City of Richmond
Planning Division
Attn. Ms. Lina Velasco
450 Civic Center Plaza
Richmond, CA 95804
via email: lina.velasco@ci.richmond.ca.us

**SUBJECT: Terminal One, 1500 Dornan Drive, Richmond, Contra Costa County –
Regional Water Board Comments on Revised Work Plan for
Groundwater Monitoring**

Dear Ms. Velasco:

I reviewed the August 4, 2020, Revised Work Plan for Groundwater Monitoring (Work Plan) prepared by Wood Environment & Infrastructure Solutions, Inc. on behalf of the City of Richmond. I have the following comments that will need to be addressed before I concur with the Work Plan.

1. According to the Work Plan, groundwater monitoring will be conducted in August 2020, November 2020, and February 2021.

Comment: As we stated in our March 3, 2020, Water Code Section 13267 Requirement for a Revised Remedial Design Report, quarterly, long-term groundwater monitoring is required, to evaluate seasonal variation of petroleum discharges to the San Francisco Bay and the effectiveness of the proposed slurry wall to prevent the discharges.

Quarterly, long-term groundwater monitoring was abandoned during the third quarter of 2019. The data gap, now spanning at least four quarters, limits our understanding of petroleum discharges to the San Francisco Bay and our ability to evaluate future slurry wall performance.

The Work Plan must be acceptably revised to describe the quarterly, long-term groundwater monitoring that will be performed without interruption or cessation. The Work Plan must also cover the sampling of the proposed new monitoring wells and

piezometers, beginning the quarter in which they are installed and continuing uninterrupted and without cessation.

2. The Work Plan did not include shoreline well MW05. I understand that proposed piezometer PZ4 (to be paired with well BT02s) may in the future replace MW05. Groundwater sample analytical results for MW05 provide important information about the quality of petroleum-contaminated groundwater within the tidal mixing zone.

Comment: Monitor/sample shoreline well MW05. Explain why proposed piezometer PZ4 would replace, or be installed adjacent to, well MW05.

3. The First and Second Quarter 2019 Groundwater Monitoring Reports describe a “dark viscous material” in shoreline monitoring well MWTH6, which prevented groundwater level gauging and sample collection.

Comment: Remove the dark viscous material to access groundwater for gauging/sampling. Collect a sample of the dark viscous material and analyze it for potential constituents of concern. Resume gauging/sampling well MWTH6.

4. According to the Work Plan, shoreline monitoring wells BT01s through BT04s are screened in the rock dike adjacent to San Francisco Bay and, *if possible* [emphasis mine], groundwater samples will be collected from these wells during the low tide cycle so that they are representative of groundwater flowing from the Site towards San Francisco Bay.

Comment: Revise the Work Plan to describe the sampling of all shoreline monitoring wells while the Bay is ebbing just prior to low tide; otherwise, samples must not be collected and another mobilization must be made during the quarter to collect groundwater samples during ebb tide.

5. The March 30, 2017, Amended Groundwater Sampling and Analysis Work Plan specifies that adjustable-flow bladder pumps will be used to collect groundwater samples. However, Monitoring Well Sample Collection Logs indicate that peristaltic pumps were used for first and second quarter 2019 groundwater sampling.

Comment: Revise the Work Plan to specify the pumps that will be used. Provide an acceptable rationale for using the selected pumps.

Please address these comments and submit a revised work plan. I will review that document and, provided the responses/changes are acceptable, will then issue a concurrence letter so that the field work can proceed as soon as possible.

If you have any question, please contact me via email jeff.white@waterboards.ca.gov.

Sincerely,

Jeff White
Water Resource Control Engineer

cc:

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