
San Francisco Bay Regional Water Quality Control Board

October 24, 2018
File No. SL0607548721 (JDW)

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 Concurrence with No Unacceptable Soil Vapor Intrusion Risk Building Unit 127A Riley Avenue Fuel Distribution System Section BR11-1 Presidio of San Francisco, California**

Dear Ms. Larssen:

I reviewed the Presidio Trust's letter dated September 7, 2018, requesting the Regional Water Board's concurrence that there is no unacceptable human health risk from soil vapor intrusion (VI) into Riley Avenue Building Unit 127A. I concur that under current conditions there is no unacceptable human health risk from soil VI into Riley Avenue Unit 127A and no further evaluation is warranted at this time.

To ensure the continuing protection of Unit 127A residents from soil VI risk, the Presidio Trust will rely on implementation of land use controls (LUCs) described in the following documents:

- *Presidio Trust Land Use Controls Master Reference Report (LUCMRR); Presidio of San Francisco*, dated December 2009;
- Site-Specific Addendum to the LUCMRR for the Riley Avenue Site; and
- Operations and Maintenance Plan for the Riley Avenue Site.

Furthermore, the Regional Water Board understands that the following LUCs are being or will be implemented by the Trust in accordance with the aforementioned documents:

- Ensuring that project proponents/Trust staff are aware of the presence of subsurface contaminants associated with the Riley Avenue fuel distribution system (FDS) through the Trust's Project Review/Permitting Program;
- Following a site-specific Health and Safety Plan for personnel potentially exposed to FDS-contaminated soils;
- Managing and disposing of excavated soils in accordance with applicable Presidio policies and applicable law and regulations;

- Disclosing to potential residents the presence of FDS contamination via completed *Residential Lease Disclosure* forms;
- Prohibiting slab alterations and ground-disturbing activities via *Residential Leases* and *The Presidio Residential Rules*;
- Requiring “Dig Permits” to ensure that slab or ground-disturbing activities comply with the LUCs;
- Routinely inspecting, maintaining, and repairing slab cracks or other slab damage; and
- Sampling and analyzing indoor air for constituents of concern, during periods when Unit 127A is unoccupied and after any remodeling or other improvement has penetrated or significantly altered the basement slab.

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

Sincerely,

Jeffrey D. White
Water Resource Control Engineer