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From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: UNDERGROUND STORAGE TANK (UST) REMOVALS, NAVAL STATION
TREASURE ISLAND, HUNTERS POINT ANNEX, SAN FRANCISCO, CA.

1. The U.S. Navy's response to California Regional Water Quality Control Board (RWQCB) comments dated March 12, 1992 (sic) on the Draft Removal Action Plan/Tank Abandonment Plan Addendum, February 10, 1993 for the subject project is forwarded as enclosure (1). Following their review of the document, the U.S. Environmental Protection Agency and the California Department of Toxic Substances Control had no comments on the Draft Addendum.
2. The enclosed response and the Draft Addendum will constitute the Final Removal Action Plan/Tank Abandonment Plan Addendum.
3. Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: William Radzevich, Code 1811WR, (415) 244-2555).

LOUISE T. LEW
By direction

Encl: (1) Response To RWQCB Comments To Closure Plan Addendum, Naval Station Treasure Island, Hunters Point Annex, San Francisco

Distribution:

U.S. Environmental Protection Agency (Attn: Roberta Blank)
California Department of Toxic Substances Control (Attn: Bonnie Arthur)
California Regional Water Quality Control Board (Attn: Barbara Smith)

Copy to:

National Oceanic & Atmospheric Administration (Attn: Denise Klimas)
U.S. Department of the Interior (Attn: Bill Allen)
U.S. Fish & Wildlife Service (Attn: Steve Schwarzbach)
Agency for Toxic Substances and Disease Registry (Attn: Joan Davis)
California Department of Fish & Game (Attn: Mike Rugg)
Bay Area Air Quality Management District (Attn: Catherine Fortney)
Bay Conservation and Development Commission (Attn: Nancy Wakeman)
City and County of San Francisco (Attn: David Wells)
San Francisco District Attorney (Attn: Steve Castleman)
TRC Public Representative (Attn: Leslie Katz)
TAG (Attn: Sy-Allen Browning)
PRC (Attn: Gary Welshans)
Harding Lawson Associates (Attn: Ashok Verma)
NAVSTA Treasure Island (Attn: Jim Sullivan)
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**RESPONSE TO RWQCB COMMENTS TO CLOSURE PLAN ADDENDUM,
NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX, SAN FRANCISCO**

GENERAL COMMENTS:

Comment No. 1: p. 4, Section 2.1: The Tri-Regional Board guidance clearly states that soil samples "are to be taken from beneath the tank pit a maximum of two feet into the native soil" (p.13, "CASE A"). Therefore, soil samples to be used to document that the subject tank had not leaked must be taken before the planned excavation ("to a maximum distance of 5 feet from the tank edge") is performed. Soil samples may be obtained from the backhoe bucket as described in the guidance document. Additional sampling at the five foot level may be requested at the direction of the regulators on site.

Response: Comment noted. Soil samples will be collected from beneath the tank pit a maximum of 2 feet into the native soil, prior to any deeper excavation beyond 2 feet.

Comment No. 2: p. 5, Section 2.3: Backfilling of excavations with "clean, imported materials" is approved, but care must be taken to assure that the fill material meets these specifications. What type of testing requirements will the Navy request of its provider(s) of fill materials for the site to assure that it is "clean"?

Response: The Navy will require the contractor supplying backfill material to provide a certificate establishing that the material is not contaminated or describing the source of the backfill material. Normally, backfill material supplied will conform to Caltrans specifications, which require it to be free from organic matter and other deleterious materials.