



DEPARTMENT OF THE NAVY

WESTERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
900 COMMODORE DRIVE  
SAN BRUNO, CALIFORNIA 94066-2402

IN REPLY REFER TO:

5090  
Ser T4E1DS/L4046  
18 November 1993

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

Subj: NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX

Encl: (1) Responses to Regulatory Agency Comments on Draft Treatability Study Work Plan for Treating Subsurface Petroleum Products at Site IR-3 by Biodegradation, Naval Station Treasure Island, Hunters Point Annex, October 21, 1993 (PRC)  
(2) Draft Final Treatability Study Work Plan, Operable Unit 1, Site IR-3, Naval Station Treasure Island, Hunters Point Annex, San Francisco, California, November 16, 1993 (HLA)

1. We are forwarding for your review and comments enclosures 1 and 2 which are delivered in accordance with the Naval Station Treasure Island, Hunters Point Annex Federal Facility Agreement.
2. Because of the very technical nature of the agencies comments on the Draft Work Plan, the following components of enclosure (1) apply:
  - The Navy will submit a revised Final Work Plan as a comprehensive document which will address experimental procedures, field sampling and analysis, and QA/QC procedures in additional detail. The Final Work Plan will be prepared after the Navy issues a new contract to conduct this treatability study.
  - The Final Work Plan will reflect the technical approach of the subcontractor (ECVOA) after it has been evaluated and modified to satisfy the Navy's contractual and technical requirements and the agencies comments.
  - The technical approach discussed in Section 2.0 and 3.0 of the Draft Work Plan identifies the originally intended goals of each tier of testing, in agreement with the Guide for Conducting Treatability Studies Under CERCLA, Final (EPA 1992). On the other hand, ECOVA's proposal, presented in Appendix C of the Draft Work Plan, presents a modification of the three-tiered approach to EPA 1992. The first tier in ECOVA's proposal includes the objectives of the first tier and part of the objectives of the second tier of testing, as specified in the EPA guidance. The second tier of testing in ECOVA's proposal includes the remaining objectives of the second tier and part of the objectives of the third tier of testing, as specified in the EPA guidance. ECOVA's third tier incorporates the findings of the first and second tiers to generate a full-scale remedial design for the oil ponds. This modified approach by ECOVA was deemed to be more expedient in terms of overall cost and time. The experimental protocol, to be provided in further detail in the Final Work Plan will correspond to the approach proposed by ECOVA.

3. We would also like to reiterate our suggestion that a conference call be arranged with the personnel involved in the review of the Draft Work Plan so that all comments may be addressed in a proper manner. Should you have any questions regarding these matters, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Dave Song, Code T4E1DS, (415) 244-2561).

4. Submit written comments, if any, to Commanding Officer (Attn: Jim Sullivan, Naval Station Treasure Island, Bldg. 1 (Code 84), San Francisco, CA 94130), with a copy to Western Division, Naval Facilities Engineering Command (Attn: Ray Ramos, Code T4E1), 900 Commodore Drive, San Bruno, CA 94066-2402.

  
RAYMOND E. RAMOS  
By direction

Distribution:

U.S. Environmental Protection Agency (Attn: Roberta Blank) (w/2 cys of encl)  
California Department of Toxic Substances Control (Attn: Cyrus Shabahari) (w/2 cys of encl)  
California Regional Water Quality Control Board (Attn: Dr. Barbara M. Smith)  
National Oceanic and Atmospheric Administration (Attn: Denise Klimas)  
U.S. Department of Interior (Attn: William Allen)  
U.S. Fish & Wildlife Service (Attn: James Haas)  
Agency for Toxic Substances and Disease Registry (Attn: Joan Davis)  
California Department of Fish and Game (Attn: Michael Martin)  
Bay Area Air Quality Management District (Attn: Catherine Fortney)  
Bay Conservation and Development Commission (Attn: Nancy Wakeman)  
City and County of San Francisco (Attn: Amy Brownell)  
San Francisco District Attorney (Attn: Dave Pfeiffer)  
TAG Recipient (Attn: Sy-Allen Browning)  
NAVSTA Treasure Island (Attn: Jim Sullivan) (w/2 cys of encl)  
COMNAVBASE SF (Attn: Randy Friedman)

ENCLOSURE (1)  
RESPONSE TO REGULATORY AGENCY COMMENTS ON  
DRAFT TREATABILITY STUDY WORK PLAN FOR  
TREATING SUBSURFACE PETROLEUM PRODUCTS

DATED 21 OCTOBER 1993

IS ENTERED IN THE DATABASE AND FILED AT  
ADMINISTRATIVE RECORD NO. **N00217.002930**

ENCLOSURE (2)  
DRAFT FINAL TREATABILITY STUDY WORK PLAN

DATED 16 NOVEMBER 1993

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ADMINISTRATIVE RECORD NO. **N00217.002929**