

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
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(415) 540-3724

N60028_000036
TREASURE ISLAND
SSIC NO. 5090.3.A



August 21, 1991

Commanding Officer
Western Division
Attn: Mr. Ernesto Galang
Naval Facilities Engineering Command
P.O. Box 727
San Bruno, California 94066-0720

Dear Mr. Galang:

**STATE'S COMMENTS ON THE DRAFT FINAL FEASIBILITY STUDY OF FLOATING
PRODUCT REMOVAL, TREASURE ISLAND, CALIFORNIA**

On August 19, 1991, the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (Water Board) (DTSC) received a copy of the Draft Final Feasibility Study of Floating Product Removal Report. The report focuses on the Fire Training Area (FTA) and Fuel Farm Area (FFA). Both DTSC and the Water Board completed their review of the report. Enclosed you will find regulatory agencies' comments to the report. Please ensure that these comments are addressed when revising the report and during the implementation of the investigation.

You may call me at (415) 540-3815 if you have questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Romy F. Fuentes".

Romy F. Fuentes
Waste Management Engineer
Site Mitigation Branch
Region 2

Enclosures

cc: See next page

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Mr. Ernesto Galang
August 21, 1991
Page Two

cc: Commanding Officer
Building One, Code 82.2
Attn.: Mr. Eddie Sarmiento
Staff Civil Engineers Office
NAVSTA Treasure Island
San Francisco, California 94103

Mr. Tom Gandesbery
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

ADMIN RECORD

DTSC COMMENTS ON FEASIBILITY (SUITABILITY) STUDY OF FLOATING
PRODUCT REMOVAL TREASURE ISLAND NAVAL STATION

GENERAL COMMENT:

The report is generally satisfactory for its intended purpose. However, as discussed and agreed during the July 30, 1991 meeting at Treasure Island, agencies would prefer to call this investigation as "Suitability Study of Floating Product Removal." The word change from "Feasibility" to "Suitability" is to differentiate this investigation from the more detailed Feasibility Study investigation that is going to be performed at the Fire Training Area and Fuel Farm Area once the size and overall extent of contamination at these sites are fully delineated by the Navy. As proposed by the Navy, RI/FS investigations at these two sites along with the Former Bunker Area (Site 12) will be accelerated due to the apparent public and environmental concerns at these sites.

SPECIFIC COMMENTS:

1. Page 21, section 3.2.1, first sentence. Previously surveyed reference (datum) points should be located and re-marked. If the Navy is not sure about the location of the reference point for each well, a licensed surveyor should re-survey the reference points prior to collection of water level and product thickness measurements. All reference points and water level measurements should be reported in feet below (negative) or feet above (positive) mean sea level (msl). Product thickness and depth of water column should be reported in inches or in feet.

2. Page 28, section 3.2.4, middle paragraph of the page. The methods of Bouwer (19189), and Bouwer and Rice (1976) are mainly used for an unconfined aquifer and the method of Papadopulus et al. (1973) is used for a confined aquifer. Since ground water at the sites is unconfined, the Navy should adopt the Bouwer's method.

3. Page 34, section 4.3. Quantitation limits for analyzes reported should be included as one of the quality assurance objectives. Mr. Fred Seto (Tel. No. 415-540-3388) of State's Hazardous Materials Laboratory (HML) should be contacted to obtain most recent quantitation limits.

4. Page 37, table 5. Direct reading instrument, such as PID should be included in this table since page 16 of the Health and Safety section of this report included this instrument for initial site survey of wells.

5. Page 40, section 4.9.1. Field blanks and matrix spikes should be included in the field quality control samples. A blank or a matrix spike/matrix spike duplicate should be analyzed: one for every single matrix; or one for every batch; or one for every 20 field samples. The desired frequency of field QA/QC samples should provide the most complete and adequate set of QA/QC data.

6. Page 43, table 6. Please see comment 4.

8/1/91

RWQCB COMMENTS ON DRAFT FIELD WORK PLAN
FOR FLOATING PRODUCT REMOVAL
DATED JULY 12, 1991

p.12 The workplan states that samples were taken from "nine piezometers" and proposes to use them for future groundwater sampling. Why are piezometers being used to monitor groundwater? Piezometers are constructed only for measuring groundwater elevation and not the chemical and physical nature of groundwater from an aquifer. Use of the term piezometer indicates that the objects were not intended to function as groundwater monitoring wells nor are they capable of functioning as groundwater monitoring wells. Screen length, slot size, diameter, construction techniques and materials should be evaluated before using the piezometers as monitoring wells. Alternatively, the Navy could use the piezometers to determine the depth to water and gradient of groundwater in the immediate area and then install permanent monitoring wells to monitor the appropriate zone.

p. 20, 27: Section 3.2.4. The Navy should evaluate the use of pump tests as well as slug tests. Since groundwater remediation is anticipated for the two locations and the contaminants are easily disposed of, the Navy should conduct pump tests to assess the properties of the fill and sediments at the site.

General: Based upon the large quantity of floating product found at the site, RWQCB staff anticipate that a floating product recovery system will be installed as an interim measure. Periodic removal of floating product from the onsite wells will not be adequate. RWQCB policy dictates that floating product be given highest priority and that an interim floating product removal system be installed as soon as possible.