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

Subj: REMEDIAL INVESTIGATION FEASIBILITY STUDY FOR NAVAL STATION,  
TREASURE ISLAND

Encl: (1) Minutes of the Technical Review Committee meeting (Sep 24, 1991)  
(2) Minutes of the FFSRA Technical Review Meeting (Oct 3, 1991)

1. Enclosures (1) and (2) are minutes of the meetings held in the activity as noted for the Remedial Investigation (RI) Feasibility Study (FS) at Naval Station, Treasure Island.

2. Thank you for your guidance and involvement in this RI/FS. For further information please contact Mr. Ernesto M. Galang, Code 1813EG, at Commercial (415) 244-2560.

Original signed by:

GILBERT A. RIVERA  
Head, Installation Restoration Section

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MIN/1

SAN FRANCISCO OFFICE

Date : October 14, 1991

To : Ernest Galang, EIC  
Navy WESTDIV, San Bruno

From : Emily Pimentel, Project Manager  
PRC San Francisco

Doc. Control : 044-0015

Subject : Minutes of the Naval Station Treasure Island Technical Review Committee Meeting on the Remedial Investigation/Feasibility Study

The subject meeting convened on September 24, 1991, at 1300 hours at the Naval Station Treasure Island. An agenda and a list of attendees is provided as attachment 1 and 2, respectively. The meeting addressed agenda item Nos. I and II concurrently, so the meeting notes address these as one general section on project plan comments, followed by a section on other issues.

I. PROJECT PLAN COMMENTS

1. Navy/PRC began with an overview on the status of RI/FS project plan submittals. Navy/PRC stated that they had submitted draft finals and received DTSC and RWQCB comments on all project plans referenced in the agenda. Navy/PRC reported they had addressed DTSC and RWQCB comments on the Quality Assurance Project Plan (QAPjP) and Health & Safety Plan (HSP) and had revised the documents accordingly. Additionally, Navy PRC were currently addressing DTSC and RWQCB comments on the work plan (WP) and Field Sampling Plan (FSP).
2. DTSC and RWQCB offered to clarify any comments they provided on any of the RI/FS project plans. Navy/PRC indicated they did not need any clarification on the QAPjP and had, in fact, already submitted these documents to DTSC. (Note: DTSC as the lead state agency would distribute documents provided to other cognizant agencies.) Navy/PRC did want to receive clarification on the WP and FSP comments, by addressing general comments and then specific comments. PRC/Navy provided general comments on the WP and FSP.

General Comments on WP and FSP

1. Navy/PRC concur that either limited or no detailed information was provided regarding recently completed studies at the New Fuel Tank Site No. 14, Auto Hobby shop Site No. 20, and Fire Training area Site No. 6. This information was primarily omitted because 1) these studies pertain to the Navy's underground storage tank (UST) investigation program UST on petroleum hydrocarbon-related contamination and (2) these studies are in part on-going or were at the time the project plans were completed. The work plans and FSP will address the current status of these studies. The studies reported include:

- Auto Hobby Shop Site - Navy is currently conducting cleanup to address past UST fuel spills. The contaminated soil was excavated and subjected to an experimental cleanup approach consisting of mechanical aeration of the soil to drive off volatiles. Sampling was recently completed to determine the effectiveness of this remediation approach.
  - New Fuel Tank Site No. 14 and Fire Training area Site No. 6: A study is currently underway to determine the suitability of existing monitoring wells to use for a pump and treat approach to cleanup floating product in the ground water. A decision to proceed with actual cleanup of floating product will be determined, in part, on the results of this study.
2. DTSC commented that they were concerned how the actions and results of these studies will be integrated in the RI/FS program. They indicated that work conducted under the UST program could be considered invalid in the RI/FS program. This point remained an open issue with DTSC and Navy.
  3. DTSC also asked why Navy was considering pump and treat at this time, when the contamination being addressed may not be related to just UST leakage. RWQCB responded that floating product is migrating off-site, and thus they would prefer to see some action taken now to address floating product.
  4. Navy/PRC also reported on the site investigation and baseline risk assessment conducted by PRC at the Old Bunker area Site No. 12, aka the family housing area. The results of these investigations are currently under review. The results of these studies will be incorporated as part of the RI/FS record. Navy chose to expedite risk assessment studies for this area because of the areas current use.

#### Field Sampling Plan (FSP) Comments

1. Regarding DTSC comments No. 1, 2, and 3 on the FSP Navy/PRC reported that upon approval of the work plan, PRC would conduct a preliminary survey to determine which of the three geophysical surveys would be appropriate. However, DTSC commented they would prefer that the preliminary survey be conducted prior to approval of project plans. The results of the preliminary survey would be used to justify the specifics used to proceed with selection of survey type, extent of survey, and survey instrument frequency modes. Navy/PRC agreed to conduct the preliminary survey and incorporate survey criteria and selection into the FSP.
2. Navy/PRC commented that for DTSC WP comment No. 7, PRC will show additional soil borings to characterize three stained areas.
3. Navy/PRC wanted a clarification on DTSC comment No. 8, specifically what was meant by waste acids should be analyzed. DTSC agreed that waste acid analysis was not an appropriate term and that analysis of soil pH would be appropriate to meet the intent of the comment.
4. Navy/PRC pointed out that on DTSC comment no. 10, the FSP proposed to analyze organochlorine pesticides and chlorinated herbicides only because these are more common categories of pesticides/herbicides and there is currently no reason to believe other classes are present. DTSC concurred with the approach proposed.
5. Navy/PRC requested clarification for DTSC comment No. 11 on the term "diphenylamine and phosphorus-based explosives". In addition, Navy/PRC proposed that in lieu of analyzing for lead azide, the FSP would propose analysis for lead metal. If the lead concentrations were high, then more specific lead analysis could be provided. Additionally, in lieu of analyzing for the explosives and other compounds listed, the FSP would propose analysis of explosives. Per the U.S. Army Toxic and Hazardous Material Agency Methods for explosives. This approach appeared to be acceptable to DTSC. Navy will send a description of the proposed method for DTSC's review. In the interim, the FSP will propose this approach.

### Work Plan (WP) Comments

DTSC comment No. 7 was addressed by discussion for FSP comment No. 11

### Health & Safety Plan (HSP) Comments

DTSC reported that although comments were provided to Navy on the HSP, they wanted to provide some additional ones. Specifically, they felt the organization of the HSP may be helpful for the field team, but they found it was difficult to review because of the many sections and its length. However, this was not considered a comment requiring action. Additionally, it was pointed out that some of the PEL's (permissible exposure limits) did not agree with the most recent published literature. PRC agreed to review the PEL's reported in the HSP.

## II. OTHER ISSUES

Although DTSC had expected to discuss issues relative to the pending Federal Facility Site Remediation Agreement (FFSRA), however, Navy indicated they wanted to discuss this issue at another meeting time still to be determined. Consequently, issues pertaining to the FFSRA were not discussed.

Navy did not specify when the revised FSP and WP would be submitted to DTSC.

The meeting concluded at approximately 1600 hours.

*Attachment No. 1*

**AGENDA  
TECHNICAL REVIEW COMMITTEE MEETING  
REMEDIAL INVESTIGATION/FEASIBILITY STUDY  
NAVAL AIR STATION TREASURE ISLAND**

SEPTEMBER 24, 1991

- I. PRESENTATION OF COMMENTS BY THE DTSC & RWQCB**
  - a. Suitability Study of Floating Product Removal for Fire Training School and Fuel Farm Area.
  - b. RI/FS WORKPLANS
    - i. Workplan
    - ii. Field Sampling Plan (FSP)
    - iii. Quality Assurance Project Plan (QAPP)
    - iv. Health & Safety Plan (HSP)
- II. WESTDIV'S COMMENTS TO THE DTSC & RWQCB COMMENTS**
- III. OTHER ISSUES**

TECHNICAL REVIEW COMMITTEE MEETING ATTENDEES  
 REMEDIAL INVESTIGATION/FEASIBILITY STUDY  
 NAVAL AIR STATION TREASURE ISLAND

24 SEPTEMBER 1991

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16.		
17.		
18.		

SAN FRANCISCO OFFICE

Date : October 17, 1991

To : Ernest Galang, EIC  
Navy WESTDIV, San Bruno

From : Emily Pimentel  
PRC San Francisco

Doc.  
Control : 044-0015

Subject : Meeting Minutes of the Naval Station Treasure Island  
Federal Facility Site Remediation Agreement

A meeting was held to discuss the elements for a proposed Federal Facility Site Remediation Agreement (FFSRA) between the Navy, the California Department of Toxic Substance Control (DTSC), and San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) for Naval Station Treasure Island. The DTSC and SFBRWQCB are collectively part of the California Environmental Protection Agency (Cal EPA). However, the DTSC is assuming the lead role for negotiating a FFSRA. The meeting was held October 3, 1991, convened at 1330 hours, and included the attendees listed in the enclosed attachment.

The discussions addressed two issues: 1) identification of deliverables, specifically what would constitute primary and secondary documents, and 2) identification of schedules for each deliverable. The Navy indicated it was prepared to discuss and reach general agreement on the identification of deliverables, but was only prepared to generally discuss schedules. Given the two issues discussed, the meeting notes are presented in two sections each addressing the specific issue discussed. Much of the discussions revolved around the Draft FFSRA for Naval Station Treasure Island, a document prepared by DTSC and submitted to the Navy on August 14, 1991. This document in the meeting minutes is identified as the Draft FFSRA. Furthermore, both the Navy and DTSC agreed to discuss only the schedule pertaining to the Remedial Investigation/Feasibility Study (RI/FS) process, though all necessary documents for the RI/FS and Remedial Design/Remedial Action (RD/RA) process were discussed.

I. Deliverables

DTSC referred to Appendix D of the Draft FFSRA and asked the Navy whether they agreed to the list of primary and secondary documents listed in the appendix. The Navy agreed to define the following as primary documents and secondary documents:

**PRIMARY DOCUMENTS**

Work Plans (WP)  
Sampling Plans (SP)  
Quality Assurance Plan (QAP)  
Health and Safety Plan (HSP)  
Community Relations Plan (CRP)  
Remedial Investigation (RI)

Feasibility Study (FS)  
Remedial Design Work Plans  
Final (100%) Design Report

## SECONDARY DOCUMENTS

### Remedial Investigation Phase Documents

Sampling Results Technical Memorandum  
Removal Action Memorandum \*  
Public Health and Environmental Evaluation (PHEE) Part I, II, and III  
Part I: Baseline Risk Assessment  
Part II: Risk Assessment of Alternatives  
Part III: Environmental Assessment (EA)

### Feasibility Study Phase Documents

Public Notice and Fact Sheets  
Treatability Studies \*  
Initial Screening of Alternatives  
Detailed Analysis of Alternatives  
Proposed Plan [equivalent to Remedial Action Plan (RAP) and Record of Decision (ROD)]

### Remedial Action Plan Phase Documents

Remedial Action Schedules (for RD/RA)  
Health and Safety Plan (for RA)

### Remedial Design Phase Documents

Preliminary (30%) Engineering Design Plans  
Implementation Schedules

Documents marked with an asterisk (\*) are considered an "if generated" document, meaning that the need for these types of documents would be determined as the RI/FS process progressed.

There was considerable discussion on what constituted the Baseline Risk Assessment document identified in the Draft FFSRA. It was agreed by the Navy and DTSC that this document would include three components collectively referred to as the PHEE. Currently, the project plan phase documents consisting of the WP and SP have been submitted and are being finalized. However, PRC stated that the WP and SP did not propose an EA, nor did DTSC provide any comments relative to this area of the RI/FS. DTSC and RWQCB indicated that specific comments to include an EA would be forthcoming.

PRC also wanted to reach agreement on what kind of engineering plan documents the DTSC expected as a secondary document. DTSC agreed with PRC's clarification that the preliminary engineering plans representing 30% completion of the design would be submitted as a secondary document.

The Navy and DTSC wanted to reach agreement on the number of submittals for each document. It was agreed that secondary documents would be submitted to the Cal EPA, but although the Cal EPA may provide comments on secondary documents, the Navy would not be expected to revise them. However, primary documents would be expected to be revised and resubmitted for approval by the Cal EPA. Although the Draft FFSRA presents details with respect to what a first draft and second draft would be called (e.g. Draft Final or Final) DTSC said additional clarification on this would be forthcoming from DTSC since some changes on this issue are being considered.

## II. Schedules

DTSC and the Navy referred to Appendix D of the Draft FFSRA that presented a schedule for submittal of primary and secondary documents. Navy discussed a draft RI/FS schedule that was prepared by PRC, but had not undergone Navy review. A copy of the schedule was shared with DTSC and RWQCB for the purpose of discussion but was not submitted to them.

The Navy and DTSC agreed that for the purposes of scheduling a regulatory review time of 60 days should be assumed for all primary documents and 30 days for secondary documents.

The Navy proposed that the schedule begin with the implementation of the RI/FS project plans on April 6, 1992. The proposed schedule has a length of 2 years and 30 weeks from initiation of field work to the submittal of the first draft of the Remedial Action Plan (Record of Decision equivalent). Navy/PRC pointed out that the schedule assumes completing only Phase I fieldwork effort. DTSC responded that they understood this assumption. Navy/PRC also pointed out that the remedial investigation phase and the feasibility study phase overlapped to the maximum extent feasible. Limitations to beginning the baseline risk assessment work included log time from collecting samples to completing lab analyses and data validation. Lab analyses to data validation takes at least 60 to 90 days depending on the complexity of analyses and number of samples.

DTSC commented they would prefer that the Navy consider reducing the schedule by 6 months. They felt this might be accomplished by breaking up the study area into operable units. The Navy indicated that the draft schedule being discussed had not been reviewed and discussed internally. Consequently, they would still have to review it to determine how appropriate it was. However, the Navy did agree to consider the possibility and suitability of breaking up the site into operable units.

The meeting concluded with the Navy agreeing to call Mr. Chien Kao of DTSC on Tuesday October 15 to discuss when it would be appropriate to meet again to continue discussions pertaining to the development of a FFSRA for Naval Station Treasure Island.

# WASTE MINIMIZATION: PROFITING FROM WISE HAZARDOUS WASTE MANAGEMENT

## I. INTRODUCTION

- A. What is Waste Minimization?
- B. Why is Waste Minimization Important?
  - 1. Disposal and Treatment Capacity
  - 2. Reduced Exposure to Toxicity
  - 3. Resource Conservation
  - 4. Economic Benefits
  - 5. Public Relations

## II. POLICY DEVELOPMENT

- A. Identifying Goals
- B. Instituting Policy Directives
- C. Identifying Priority Industries and Waste Streams
- D. Identifying Barriers to Waste Minimization

## III. PROGRAM APPROACHES

- A. Educational Programs
- B. Technical Assistance Approaches
- C. Regulatory Programs
  - 1. Direct Regulatory Requirements
  - 2. Indirect Regulatory Requirements
  - 3. Positive Incentives

## IV. CONCLUSION

3 Oct 91  
TREASURY ISLAND

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