

prc ENVIRONMENTAL MANAGEMENT INC.

MEMORANDUM

SAN FRANCISCO OFFICE

**Date** : October 25, 1991  
**To** : Ernie M. Galang, EIC  
Navy WESTDIV San Bruno  
**From** : Emily Pimentel  
PRC San Francisco  
**Document Control** : 044-0015  
**Subject** : Response to Navy comments on the work plan (WP) and field sampling plan (FSP) for remedial investigation/feasibility study (RI/FS), Naval Station Treasure Island (NAVSTA TI), California.

NAVY REVIEW COMMENTS

GENERAL COMMENTS

1. Comment: Revise tabs from APPENDIX to TABLES, FIGURES and SOPs. Revise front page to conform with the QAPjP and HSP work plans.

Response: The front page and all tabs have been revised accordingly.

SPECIFIC COMMENTS

Draft Final Work Plan

1. Comment: Figure 5. Delete one of the two listed site 16 in the Legend. Mark site 25 on the map. Delete site location 2 from the map.

Response: Figure 5 has been revised as specified.

2. Comment: Page 7. There are 904 housing units on TI. versus 1009 housing units.

Response: The description of the number of housing units has been revised as specified.

3. Comment: Page 8. "Additional investigations were not warranted at sites 2.....etc." During the water construction project at the housing area, site 2, the contractor took some soil samples of the trench they excavated in front of Westside Drive. This area indicated presence of lead with concentrations exceeding the STLC. Copper was also found to be present at a concentration of 3100 mg/kg. Please explain the statement above. What happens to site 2?

Response: The recommendation that additional investigations were not warranted at site 2, the Radiation Training Area, came from the NAVSTA TI preliminary assessment/site inspection (PA/SI) completed in 1988. Subsequently, site 2 was not included in contract task order (CTO) 15 specifying completion of the RI/FS work plan and FSP. Field investigations at site 2 have been added to this RI/FS. The RI/FS investigations for site 2 will be conducted as part of site 12, since the area is part of the housing area. However, it should be noted that in the Navy's specific comment number 1 to draft final work plan, PRC was instructed to delete the location of site 2 from Figure 5, the facility-wide site location map. Specific RI activities at site 2 will be considered part of site 12.

4. Comment: Page 28. Old Fuel Farm. Is there any work being done with regards to the abandoned pipe lines? Any sampling anticipated to be done around this area where suspected oil has been found?

Response: A main purpose of the proposed geophysical survey at site 15 is to identify any abandoned pipelines possibly associated with previous fuel storage activities. The locations of suspected oil contamination will be considered when determining soil boring locations at this site. This point has been clarified in Section 5.14 of the FSP.

5. Comment: Page 29: Tanks 103 and 104. During the earthquake of 1989, underground fuel lines were severely damaged. Potential leaks on these lines are suspected. We have requested to have this included in the study.

Response: The descriptions of RI activities at site 17 have been revised in Sections 3.2.16 and 5.3.16 of the work plan and Section 5.16 of the FSP to include investigation of potential contamination from damaged underground fuel pipelines.

6. Comment: Page 31: Auto Hobby Shop and Transportation Center. Contaminated soil treatment by bioremediation is ongoing right now at B225 site. During this project, no sidewall samples adjacent to the roadway were collected because of the visible contamination present. On 23 Oct 1990, the city of SF advanced five soil borings to the

groundwater to define the extent of soil contamination under the roadway. Due to contractual problems, no data in regards to the various sampling events were provided.

Should this be included as an RI? Evidently, the contamination (if any) might have migrated to the housing area.

Response: Additional sampling of the excavation sidewall and ground water collected from the bottom of the excavation was recently completed as part of CTO 61. A discussion of the results of this sampling has been added to Section 3.2.18 of the work plan. Additional investigation of the extent of contamination at site 20 will be coordinated between this RI effort and CTO 61, although it is assumed that a majority of this investigation will be completed as part of the RI.

#### Draft Final Field Sampling Plan

1. Comment: Page 9, Section 4.4.1, last sentence. Figure 3 is not a well construction diagram but a Well Construction Summary Sheet.

Response: The text has been corrected to refer to a well construction summary sheet.