



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

September 22, 1994

Ernesto M. Galang
Western Division - Code T4A2EG
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-2402

Re: Draft Navy Responses to Agency Comments on the Draft Phase I
Remedial Investigation Report for Naval Station Treasure
Island dated July 20, 1994

Dear Mr. Galang,

The U. S. Environmental Protection Agency (EPA) has received and
reviewed the subject document. EPA's comments are enclosed.

If you have any questions, please call me at (415) 744-2368.

Sincerely,

A handwritten signature in cursive script that reads "Rachel D. Simons".

Rachel D. Simons
Remedial Project Manager
Federal Facilities Cleanup Office

Enclosures

cc: Jim Sullivan, NAVSTA TI
Mary Rose Cassa, DTSC
Michael Bessette, CRWQCB
Sophia Serda, EPA
H-9-2 File

Admin Record (3 copies)

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DRAFT NAVY RESPONSES TO AGENCY COMMENTS ON THE
DRAFT PHASE I REMEDIAL INVESTIGATION (RI) REPORT
NAVAL STATION TREASURE ISLAND (NSTI) DATED JULY 20, 1994

The Navy's responses to EPA's comments were reviewed and evaluated in conjunction with work described in the Draft Phase IIB Remedial Investigation Work Plan Addendum (July 20, 1994). All of the responses were acceptable to EPA with the following exceptions:

EPA Comments Draft Phase I RI Report

1. Response to EPA's Specific Comment #3

EPA cannot evaluate this response until the Phase IIB Work Plan is received for Site 12.

2. Response to EPA's Specific Comment #4

EPA cannot evaluate this response until the Phase IIB Work Plan is received for Site 12.

3. Response to EPA's Specific Comment #19

EPA cannot evaluate this response until the Phase IIB Work Plan is received for Site 12.

4. Response to EPA's Specific Comment #20

EPA cannot evaluate this response until the Phase II Ecological Assessment Work Plan is received.

5. Response to EPA's Specific Comment #21

EPA cannot evaluate this response until the Phase II Ecological Assessment Work Plan is received.

EPA Comments Draft BHHRA

1. Response to EPA's General Comment #1

Response is adequate but not sufficient. Explicitly state the criteria that will be used to determine potability are Total Dissolved Solids (TDS) data and sustainable yield. Also, list both the State and Federal criteria. The Federal criteria for potable water sources is < 10,000 mg/l TDS and a production rate per well of > 150 gals/day; Federal criteria include consideration of interconnectiveness between potable and non potable water bearing units (See *Guidelines for Ground Water Classification Under the EPA Ground Water Protection Strategy, December 1986*).

2. Response to EPA's General Comment #4

Provide the scientific rationale for use of the body weight (bw) parameter of 70 kg when evaluating the current resident (child) receptor potential risks (Table F-1) and future resident (child/adult) receptor potential risks (Table F-7). The Work Plan for the Phase I BHHRA (*Proposed Approach for the BHHRA, dated Oct. 26, 1992*) presents intake equations that show for the current resident (child) a bw of 15 kg would be used and for the future resident (child/adult) a bw of 59 kg would be used. The Phase I BHHRA did not follow the approved Work Plan nor current risk assessment guidance.

There are no "apparent discrepancies" between Cal/EPA's PEA guidance and the Region IX Preliminary Remediation Goals. To maintain consistency with the other closing Federal Facilities use either the State's PEA guidance or the Regional guidance regarding exposure parameters.

Revise response.

3. Response to EPA's General Comment #5

Response is adequate but not sufficient. Explicitly state if the VOC exposure model will be refined to account for the capillary fringe.

4. Response to EPA's General Comment #6

The dermal absorption values used are appropriate for use in California but at this time (8/94) are not approved by EPA for use Nation Wide and thus warrant a statement of uncertainty. Revise response.

5. Response to EPA's General Comment #7

First, the response to how PRGs were used in this RI/FS is inconsistent with the Navy's response to General Comment 2. Clarify how PRGs were used in the document. Second, the PRGs developed for the RI/FS used exposure parameters from the BHHRA and some of these exposure parameters are inconsistent with the *Proposed Approach for the BHHRA, dated Oct. 26, 1992*, and State and EPA guidance. Third, Region IX PRGs account for dermal contact, inhalation of airborne particulate, inhalation of VOCs, and provide PRGs based on non carcinogenic effects. Forth, although PRGs were not used in the quantification of risk they were used as a risk screening tool to identify potential hot spots of contamination and risk (according to the Navy's response to General Comment 2) and must be presented in the risk assessment unless the development of these PRGs obtained agency approval prior to use in the RI/FS. Revise response.

6. Response to EPA's Specific Comment #3

Response is adequate but not sufficient. The exposure to storm water outfalls must be addressed in the conceptual site model.