

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

100 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

(510) 540-3724



February 3, 1995

Commanding Officer
Western Division
Attn: Mr. Ernesto Galang, Code 1813
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-0720

Dear Mr. Galang:

**COMMENTS TO DRAFT FINAL PHASE IIB REMEDIAL INVESTIGATION WORK
PLAN ADDENDUM, NAVAL STATION TREASURE ISLAND (JANUARY 3, 1995)**

The Department of Toxic Substances Control (Department) and San Francisco Bay Regional Water Quality Control Board (Regional Board) have reviewed the subject document. The Department and Regional Board have several concerns, listed below:

1. Background sampling at Yerba Buena Island and status of the aquifer;
2. The conceptual models for risk assessment;
3. Documentation of investigative trenching.

Specific comments are enclosed. If you have any questions regarding this letter, please contact me at (510) 540-3818.

Sincerely,

A handwritten signature in cursive script that reads "Mary Rose Cassa".

Mary Rose Cassa
Engineering Geologist
Office of Military Facilities

Enclosures

cc: Mr. Michael Bessette
California Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, California 94612

Ms. Rachel Simons [H-9-2]
U. S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105-3901

Admin Record (3 copies)

370



DEPARTMENT OF TOXIC SUBSTANCES CONTROL
COMMENTS TO DRAFT FINAL PHASE IIB REMEDIAL INVESTIGATION WORK
PLAN ADDENDUM (JANUARY 3, 1995)

General Comments

1. As discussed on January 23, 1995, the Navy should re-consider the number of samples proposed for dioxin analysis at Sites 12 and 6.
2. In light of the fact that Phase I trenching operations at Sites 5 and 11 were poorly documented, the Navy should ensure that all future trenching operations are adequately documented with thorough descriptions (equivalent to boring logs, including appropriate sketches) and photographs.

Specific Comments

3. **Site 12, Section 4.1, page 28 and Figure 4:** It is not clear if the "former heating oil tank" referenced in the text is the same as the "former buried oil tank" identified in Figure 4. Please clarify.
4. **Section 9.5.2, Yerba Buena Island Background Sampling Locations (page 93):** The proposed number of samples and sampling locations differ from those agreed to at the September, 1994 RPM meeting. The Navy should justify this deviation or implement the agreed sampling plan.
5. **DTSC Comment #42, page F-33:** The Department's comment does not pertain to systematic sampling, but rather recommends adding TPH, PAHs, and PCBs to the analytes for field screening analysis, in the event releases of used oil and other petroleum compounds occurred at Sites 28 and 29.
6. **Table E-1:** It seems more appropriate to include information concerning, for example, number of soil borings in the "Site Description and Source Characterization" column rather than the "Pathway Description" column.
7. **Table E-1; Figures E-1 through E-4:** Please explain why residents are considered potential receptors only at Site 1. Please also explain why inhalation of particulates is not an exposure pathway for potential human receptors.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612
(510) 286-1255



Prepared By: Michael M. Bessette Phone No.: (510) 2861028
Date: February 1, 1995 File No.: 2169.6013 (MMB)
Subject: Draft Final Phase IIB Remedial Investigation
Work Plan Addendum, for Naval Station Treasure Island, January 3, 1995

General Comments:

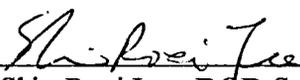
- It is the understanding of the RWQCB that once the remedial project managers (RPMs) reach an agreement regarding technical issues that future revisions of that agreement would not be performed without the consensus of all RPMs. Case in point, at the RPM meeting on September 15, 1994, DTSC, USEPA, RWQCB, the Navy and their consultant, PRC, reached an agreement for sample locations and techniques to determine background soil conditions on Yerba Buena Island, this agreement was documented in the meeting minutes and believed to be final. This document does not include the agreed upon sampling method and may demonstrate a fundamental misunderstanding of technical comments and revisions. Please revise document to include the original agreed upon sampling plan.
- At the RPM meeting on September 15, 1994, the YBI aquifer status was discussed, and additional information regarding its background characterization was felt needed. Please provide status information in Section 9.5-Determination of Background at Yerba Buena Island.

Specific Comments:

Page 93, 9.5.2 through 9.5.3: Please follow the sampling method agreed upon at the September 15, 1994 meeting minutes. "Two samples will be collected from each of the 22 soil borings: one sample from the 0.5- to 1-foot below ground surface (bgs) interval and the other at the interface between the colluvium and bedrock, at a depth greater than 3 feet bgs but not to exceed 5 feet bgs. Pairs of samples from the same interval will be composited (two samples composited to one) to obtain 11 sample from the 0.5- to 1-foot bgs interval and 11 samples from the 3- to 5-feet bgs interval, resulting in 22 samples for analysis. Where two soil borings are to be drilled at the same sampling location, the soil borings will be placed a minimum of 10 feet apart unless a shorter distance is agreed upon [*by the RPMs*] during the field sampling. The Navy will make a "good faith" effort to drill no more than two soil borings at the same location and to collect two samples from each soil boring at the specified intervals."

Page E-24 and E-26, Figures E-1 and E-3: Conceptual models should indicate the approximate groundwater table with an inferred groundwater flow direction arrow.

Concurred by:


Shin-Roei Lee, DOD Section Leader