



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

N60028_000418
TREASURE ISLAND
SSIC NO. 5090.3.A

June 26, 1995

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

Re: Draft Engineering Evaluation/Cost Analysis - Removal Action
for Petroleum-Contaminated Soil at Sites 6, 14 and 22 and
Floating Product at Site 6 for Naval Station Treasure Island
dated April 21, 1995

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) 744-2383.

Sincerely,

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
H-9-2 File

Admin Record (3 copies)

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418

Draft Engineering Evaluation/Cost Analysis
Removal Action for Petroleum Contaminated Soil
at Site 6, 14 and 22 and
Floating Product at Site 6 for
Naval Station Treasure Island (NSTI) dated April 21, 1995

General Comments:

1. Before further development of any site-specific Navy PRGs, EPA recommends that this issue be discussed between the Navy, EPA and DTSC risk assessors. EPA will not agree to the use of Navy PRGs until the development, use and necessity of the Navy PRGs is clearly explained.

Specific Comments:

1. Section 1.0 Introduction, page 1

Please provide a reference for the tentative soil cleanup goals of 10 mg/kg for gasoline and 100 mg/kg for diesel.

2. Section 3.4.1 Summary of Human Health Risk Assessment, page 34

Please indicate if the EPA Region 9 PRGs referenced in the text and Tables 1, 3 and 4 are industrial or residential.

3. Section 4.1.1 Landfill Disposal Description, page 41

Excavation

Sites 14 and 22 are adjacent to the NSTI sea wall. Will excavation at these sites have special requirements in order to maintain the integrity of the seawall?

4. Section 4.1.1 Landfill Disposal Description, page 41

Excavation

In discussions during several RPM/BCT meetings, there was concern about backfilling the excavation with clean soil since the groundwater will still be contaminated. It was presented in the meetings that the excavation could be lined with a plastic liner or pea gravel before the pit is backfilled with clean soil. Are these options still being considered? This comment applies to all of the alternatives that require excavation.

5. Section 4.1.4 Landfill Disposal Cost and Cleanup Time, page
43

Please indicate if the cost for this alternative is based on soil disposal at a Class I, II or III landfill.