

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

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N60028_000426
TREASURE ISLAND
SSIC NO. 5090.3.A



(510) 540-2122

August 09, 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 ENGINEERING EVALUATION/COST ANALYSIS - REMOVAL ACTION FOR PETROLEUM-CONTAMINATED SOIL AT SITES 6, 14, AND 22 AND FLOATING PRODUCT AT SITE 6, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA (APRIL 21, 1995)

The Department of Toxic Substances Control (DTSC) and San Francisco Bay Regional Water Quality Control Board have reviewed the subject document. Comments are enclosed.

Since Naval Station Treasure Island is not on the National Priorities List, the Navy is required to meet California requirements for removal actions pursuant to the California Health and Safety Code (HSC) as amended by Senate Bill (SB) 1706. SB 1706 became effective January 1, 1995, and revised the exemptions from the Remedial Action Plan (RAP) requirements to include actions where the estimated cost is less than \$1,000,000. The bill requires that the Department or a Regional Water Board approve a Removal Action Workplan (RAW) for nonemergency removal actions and that information is provided to the local affected community.

As defined in HSC Section 25323.1, "Removal action workplan" means a workplan prepared or approved by DTSC or a California Regional Water Quality Control Board which is developed to carry out a removal action, in an effective manner, which is protective of the public health and safety and the environment. The removal action workplan shall include a detailed engineering plan for conducting the removal action, a description of the onsite contamination, the goals to be achieved by the removal action, and any alternative removal options that were considered and rejected and the basis for that rejection." By including the elements of the Engineering Evaluation/Cost Analysis (EE/CA) in the RAW, the EE/CA and RAW may be considered equivalent.

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Public participation requirements for the RAW, as outlined in HSC Section 25356.1 (h)(1), include preparation of a community profile report to determine public interest in the removal action. The Department will work with the Navy to ensure appropriate opportunities are provided for public comment, which may include conducting a public meeting on the proposed removal action.

SB 1706 also provides an exclusion from hazardous waste facilities permit requirements (to the extent consistent with federal law) if the removal action is carried out pursuant to a RAW.

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

Sincerely,

Mary Rose Cassa

Mary Rose Cassa, R.G.
Engineering Geologist
Office of Military Facilities

Enclosure

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

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COMMENTS TO DRAFT ENGINEERING EVALUATION/COST ANALYSIS - REMOVAL ACTION FOR PETROLEUM-CONTAMINATED SOIL AT SITES 6, 14, AND 22 AND FLOATING PRODUCT AT SITE 6, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA (APRIL 21, 1995)

General Comments

1. The Draft EE/CA states on page 4, "Under the NCP, and EE/CA report is required for all non-time critical removal actions." State law requires that DTSC or the Regional Board approve a Removal Action Workplan for nonemergency removal actions (see cover letter).
2. ARARs only apply to environment-related laws, those that specifically address a hazardous substance, pollutant, contaminant, remedial action, location or other circumstance found at the site. Laws such as Occupational Safety and Health Administration Trenching and Shoring Requirements or Resource Conservation and Recovery Act Off-Site Treatment, Storage, and Storage Facility Requirements are not ARARs and must be complied with.
3. DTSC and the Regional Board anticipate that all language specific to this draft EE/CA will be changed as appropriate in all future revisions.

Specific Comments

4. Page 2; Section 1.1, Objective: This sections details the specific objectives of the draft EE/CA, but it appears that these objectives are the ultimate objectives of the final EE/CA. The text should be revised accordingly.
5. Page 3; Section 1.2, Rationale and Statutory Framework: This section describes disposal of sludge at Site 14. The text should specify that tank-bottom sludge was disposed in pits (see page 16). Additionally, the Navy should consider giving reasons for addressing "petroleum-only" contamination as a CERCLA response (e.g., public participation; co-mingled contamination).
6. Page 4; Section 1.3, Approach: The Navy should consider stating that advice is also being sought from the RAB as to public acceptance.
7. Page 5; Section 2.0, Background: The last sentence should be reworded to state, "More detailed site background information can be found in the references cited within the text."
8. Pages 8-16; Section 2.2, Site 6 - Fire Training School Background: The text should clarify that two wells identified as number 3 exist at the site: Well W3 and Well MW3.

9. Page 9; Section 2.2.1, Site 6 - Description and Operations: The last sentence should clarify that the underground oil-water separators are serving as pollution control for site runoff.
10. Pages 16-22; Section 2.3, Site 14 - New Fuel Farm Background: Throughout this section, floating product should be identified as diesel, gasoline, etc., as appropriate.
11. Page 16; Section 2.3.1, Site 14 - Description and Operations: Please include the approximate year when disposal of tank-bottom sludge in pits was discontinued and what method was subsequently employed.
12. Page 17; Section 2.3.2, Site 14 - Physiography: The Navy should ensure there is enough data to identify the clay in MW01 as a lens. It might be more appropriate to identify it as a clay layer, the extent of which is unknown.
13. Pages 29-33; Section 3.2, Applicable or Relevant and Appropriate Requirements (ARARs) and Table 5:
 - a. Location-Specific ARARs and TBCs: The Navy should consider the following potential ARARs:
 - (1) Fish and Game Code, Division 6, Section 5650 - prohibits water pollution of any substances deleterious to fish, plant life, or bird life: California Code of Regulations (CCR), Title 14, Section 750 et seq., resource protection;
 - (2) California Government Code, Title 7.2, San Francisco Bay Conservation and Development Commission - San Francisco Bay protection. Section 66656.1 addresses protection of shoreline sections and filling/dredging work.
 - b. Action-Specific ARARs and TBCs:
 - (1) The introductory paragraph should be modified as follows: "Once the preferred removal action is ~~agreed upon~~ (use selected or identified), an analysis . . ."
 - (2) Under Excavation-Related ARARs, the California Occupational Safety and Health Administration trenching and shoring standards are incorrectly cited as 50 FR 45654.
 - (3) On-Site Treatment and Disposal Requirements: The local Air Pollution Control District sets allowable emission limits. Limits will need to be established for emissions associated with specific

remedial alternatives. Treasure island is located in San Francisco County; therefore, applicable air quality regulations are specified in the Bay Area Air Quality Management District's Air Pollution Rules and Regulations. The National Pollutant Discharge Elimination System (NPDES) will apply, also. For treatment/disposal carried out entirely onsite, a permit is not necessary, but the Navy must meet the substantive requirements. Pretreatment standards may be necessary for discharge to the sanitary sewer system.

- (4) The Navy should consider including State Water Resources Control Board Resolutions No. 68-16 (Antidegradation Policy), No. 88-63 (Sources of Drinking Water Policy), and No. 92-49 (Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code Section 13304) as ARARs.

c. Table 5:

- (1) Please give the specific version and section of the LUFT Manual.
 - (2) Please specify the section of the San Francisco Bay Water Quality control Plan (Basin Plan). Please list specific chemicals and levels for shallow water effluent limits.
 - (3) CERCLA 121(e) (On-Site Treatment Permit Exemptions) is the law that defines ARARs and is redundant in this case.
 - (4) Corrective Action Management Unit regulations (for sites that have RCRA wastes as part of the facility cleanup) are found in 40 CCR, Section 264.552 subpart S and in 22 CCR, Section 66264.552.
14. Page 34; Section 3.4.1, Summary of Human Health Risk Assessment: The word "risk" is used out of context in the first paragraph, last sentence.
 15. Page 35; Section 3.4.2, Summary of Ecological Risk Assessment: The first sentence should be reworded, for example: "As part of the Phase I RI, a preliminary ecological risk assessment . . . was performed for Sites 6, 14, and 22 and a draft report was produced."
 16. Appendix A: The definitions of terms would be easier to understand if a diagram were included showing how the terms are related to one another.