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 Ser1832.SEG/L6096
 1 Feb 1996

California Environmental Protection Agency
 Department of Toxic Substances Control, Region 2
 Attn: Ms. Mary Rose Cassa
 700 Heinz Avenue, Suite 200
 Berkeley, CA 94710

Subj: FEDERAL FACILITY SITE REMEDIATION AGREEMENT (FFSRA) FOR
 NAVAL STATION, TREASURE ISLAND (NAVSTA TI)

Dear Ms. Cassa:

Pursuant to Section 9, Extensions, of the Naval Station Treasure Island Federal Facility Site Remediation Agreement (FFSRA), the Navy requests your concurrence to the following revised schedule of submittals per Appendix D:

Draft Primary Documents	Deadlines	Draft Secondary Documents	Target Dates		
f. Remedial Investigation (RI) Reports	08/22/96	Baseline Risk Assessment (BHHRA)	08/22/96		
		Environmental Assessment (EA) (Onshore)	08/22/96		
		Removal Action Report	T.B.D.		
		Removal Action Memorandum	T.B.D.		
g. Feasibility Study (FS) Reports	12/20/96	Public Notices and Fact Sheets	04/21/97		
		Treatability Studies	10/14/96		
h. Remedial Action Plan (RAP)/ Record of Decision (ROD)	02/05/98	Proposed Plan/Draft RAP	05/21/97		
		Remedial Action Schedules	T.B.D.		
		Public Health & Environmental Evaluation Plans	T.B.D.		
		Health & Safety Plans	T.B.D.		
		i. Remedial Designs (RD)	T.B.D.	Public Notices and Fact Sheets	T.B.D.
				Engineering Plans (30%) Design	T.B.D.
Implementation Schedule	T.B.D.				
		Health & Safety Plans	T.B.D.		

The draft Phase I RI report was submitted as scheduled on November 8, 1993. Phase II investigations were initiated to gather more information on most of the sites including the additional three installation restoration sites identified by the BRAC Cleanup Team (BCT). The BCT has decided on one RI report for NAVSTA TI. The report will incorporate Phase I and Phase II investigations for all IR sites.

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Pursuant to the Naval Station Treasure Island FFSRA provision of Section 29, Amendment Or Modification of Agreement, Attachment C - Statement Of Facts, is amended to include the following IR Sites and Operable Unit:

Site 27: Clipper Cove Skeet Range

Possible contamination attributed to the Clipper Cove skeet range area was identified by the California Regional Water Quality Control Board San Francisco Bay Region (SFRWQCB) Order No. 93-130, dated October 20, 1993. The range has been in operation for over 10 years, but has been closed for about three years. Sources of pollution are lead pellets and broken clay targets. The potential effects of lead from shotgun ranges are well documented. Direct ingestion of lead pellets causes waterfowl deaths. Clay targets contain asphaltenes, which in turn can contain polynuclear aromatic hydrocarbons. These types of hydrocarbons are classified as carcinogenic. This site was recommended for remedial investigation.

Site 28: West Side On/Off Ramps

As part of paint stripping and repainting work performed in 1992, Blaine Tech Services, Inc., a subcontractor to Seaworkers, Inc., collected 40 soil samples in the work area near the west side on and off-ramps and analyzed the samples for lead and zinc. Concentrations of lead and zinc ranged from 48 mg/kg to 8,700 mg/kg and 57 mg/kg to 5,100 mg/kg, respectively. This site was recommended for remedial investigation.

Site 29: East Side On/Off Ramps

This site has not been previously investigated. However, because of the findings in the west side on and off-ramps, Site 29 was recommended for remedial investigation.

Offshore Operable Unit

The Offshore Operable Unit (OU) includes IR Site 13 - Stormwater Outfalls (TI/YBI) and IR Site 27 - Clipper Cove Skeet Range. Since the investigation and remediation technique differs between the offshore and onshore sites, this OU has been developed for management purposes. The onshore installation restoration sites need to be remediated and made available for transfer as quickly as possible.

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The offshore sites will be managed on a regional approach. However, due to the Regional Water Quality Control Board Order 93-130, the reports for Site 27 will be submitted simultaneously with the onshore ecological risk assessment reports. The proposed schedule for the offshore OU is listed below:

Draft Primary Documents	Deadlines	Draft Secondary Documents	Target Dates
f. Remedial Investigation (RI) Reports		Environmental Assessment (EA)	
Offshore OU - Site 27	08/22/96	Offshore OU - Site 27	08/22/96
Offshore OU - Site 13	09/26/97	Offshore OU - Site 13	09/26/97
g. Feasibility Study (FS) Reports		Public Notices and Fact Sheets	
Offshore OU - Site 27	12/20/96	Offshore OU - Site 27	06/20/97
Offshore OU - Site 13	02/10/98	Offshore OU - Site 13	06/12/98
h. Remedial Action Plan (RAP) Record of Decision (ROD) (OU)		Proposed Plan/Draft RAP	T.B.D.
i. Remedial Designs (RD) (OU)	T.B.D.	Public Notices and Fact Sheets	T.B.D.
		Engineering Plans (30%) Design	T.B.D.
		Implementation Schedule	T.B.D.
		Health & Safety Plans	T.B.D.

The Navy is available to discuss this request at your convenience and should you require additional information, please contact me at (415) 244 2560.

Sincerely,

Original signed by:
ERNESTO M. GALANG
By direction of
the Commanding Officer

Copies to:
California Regional Water Quality Control Board (Attn: Ms Gina Kathuria)
U.S. Environmental Protection Agency, Region IX (Attn: Ms. Rachel Simons)
NAVSTA Treasure Island (Attn: Mr. Jim Sullivan)

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