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20 Nov 1996

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering
Command
To: Distribution

Subj: REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) FOR
NAVAL STATION TREASURE ISLAND (NAVSTA TI)

Ref: (a) WESTNAVFACENGCOM ltr, Ser T4E2EG/L4031 dtd 8 Nov 1993

Encl: (1) Consensus Statement for the Draft Phase I Remedial Investigation (RI) Report
dtd 8 Nov 1993

1. Enclosure (1) is provided for your information and to close the loop for the 8 November 1993 draft phase I remedial investigation (RI) report. This report was submitted by reference (a) to the regulatory agencies for review and comments. This consensus statement documents draft phase I RI report will remain a draft document with the phase I and phase II investigation results presented in a combined RI report, as well as other decisions made. In addition, the Navy is providing revised responses to the Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board's (RWQCB) critical comments on the subject document. These revised responses reflect the change in approach to the remedial investigation at NAVSTA TI.

2. Thank you for your guidance and involvement in this project. For further information, please call me at (415) 244-2560.

Original signed by:

ERNESTO M. GALANG
By direction of
the Commanding Officer

Distribution:

California Department of Toxic Substances Control (Attn: Mr. Chein Kao)
California Regional Water Quality Control Board (Attn: Ms. Gina Kathuria)
California Department of Fish and Game (Attn: Dr. Michael Martin) (w/o encl)
U.S. Environmental Protection Agency, Region IX (Attn: Ms. Rachel Simons)
U.S. Fish & Wildlife Services (Attn: Mr. Steve Schwarzbach) (w/o encl)
Bay Area Air Quality Management District (Attn: Mr. Julian Elliot) (w/o encl)
Bay Conservation and Development Commission (Attn: Mr. Steve McAdam) (w/o encl)
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NAVSTA Treasure Island (Attn: Mr. Jim Sullivan)
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Restoration Advisory Board: Mr. Paul Hehn (Alt Co-Chair)

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**NAVAL STATION TREASURE ISLAND
CONSENSUS STATEMENT FOR THE
DRAFT PHASE I REMEDIAL INVESTIGATION REPORT**

We, the remedial project managers (RPM), at Naval Station Treasure Island (NSTI), are dedicated to accomplishing environmental cleanup in a cost effective and quality manner to ensure the protection of human health and the environment. This consensus statement documents the following decisions made by the RPMs during the course of the NSTI remedial investigation process.

- It has been agreed that the draft Phase I Remedial Investigation Report for NSTI (dated November 8, 1993) and its contents will remain a draft document, and a Draft Final and Final Phase I Remedial Investigation Report will not be prepared. The attached "Draft Navy Responses to Agency Comments on the Draft Phase I Remedial Investigation Report" dated July 20, 1994, are officially part of the Draft Phase I Remedial Investigation Report. Additionally, conclusions and other presentations stated within the Draft Phase I Remedial Investigation Report have not been approved by the undersigned. This decision was made at the June 24, 1994, RPM/Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting, and is also documented in the meeting minutes.
- The remedial investigation at NSTI has been conducted in two phases. A Draft Remedial Investigation Report for NSTI is being prepared to incorporate all data collected during both the Phase I and Phase II investigations. Any applicable revisions based on the response to comments will also be included in the Draft Remedial Investigation Report, a Draft Final Remedial Investigation Report, and a final Remedial Investigation Report will be prepared.
- Since 1994, the remedial investigation approach at NSTI has been revised, specifically for the development of ambient levels at Treasure Island, the beneficial use of groundwater, and the transfer of sites out of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. Therefore, some of the original comments and responses may no longer be applicable. The Navy has revised its responses to the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board's (RWQCB) critical comments to reflect these changes. These revisions are attached to this consensus statement to provide an update on the revised approach. However, the responses to the remaining comments have not been revised.
- After the Phase II remedial investigation was conducted, the RPMs met and concluded that Installation Restoration (IR) Sites 04, 06, 14, 15, 16, 19, 20, 22, and 25 fell under the CERCLA's petroleum exclusion clause. This decision was documented in the Navy's letter dated May 22, 1996. The investigation at these nine sites will be documented in a corrective action plan and will not be included in any editions of the Remedial Investigation Reports.

This consensus statement, attached revised responses to the critical comments, and the attached response to comments are hereby part of the draft Phase I Remedial Investigation Report and shall not be removed.



U.S. Navy, EFA WEST
Ernesto M. Galang

11/19/96
Date



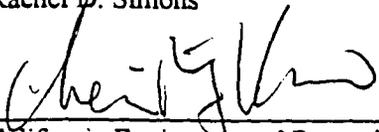
U.S. Navy, NAVSTA TI
James Sullivan

11/19/96
Date



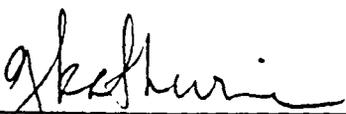
U.S. Environmental Protection Agency
Rachel D. Simons

11/19/96
Date



California Environmental Protection Agency
Department of Toxic Substances Control
Chein Kao

11/19/96
Date



California Environmental Protection Agency
Regional Water Quality Control Board
Gina Kathuria

11/19/96
Date

**NAVY'S REVISED RESPONSE TO DTSC AND RWQCB CRITICAL COMMENTS
DRAFT PHASE I RI REPORT, DRAFT BHHRA, AND DRAFT EA**

1. **Comment:** All data used to characterize the extent of contamination at NAVSTA Treasure Island should be included in the draft Remedial Investigation (RI) Report. Pertinent data from past investigations should be presented on the figures.

Response: All data used to characterize the extent of contamination at NAVSTA TI were included in the Draft Phase I RI report. All data collected during the phase I RI were included on the individual site maps. Data collected during other investigations were included as tables attached to the report. All pertinent data from previous investigations will be included on the figures in the Draft RI report.

2. **Comment:** A discussion on the useability of past data in site characterization and risk assessment needs to be included in the RI Report. If the past data is of a quality that does not allow its application for risk assessment or site characterization, those data points may require resampling.

Response: A discussion on the useability of past data collected for site characterization and risk assessment will be included in the Draft RI report. The quality and the intended purpose of the data will be considered. For example, the preliminary assessment/site inspection (PA/SI) data should be used for qualitative purposes such as initial site characterization and making decisions concerning future investigations. This does not, however, imply that the PA/SI data requires resampling to confirm results with data of "better" quality. The past data are assumed to be of good quality, but with lesser documentation, so they generally cannot be used for making critical decisions.

3. **Comment:** The Navy has concluded that several Installation Restoration sites do not require further investigation. The Cal/EPA does not agree with that conclusion for sites 4/19, 7, 12, 14, 15, 16, 20, 22, and 24. The nature and extent of contamination for these sites has not been satisfactorily identified.

Response: The Navy has performed additional field work at several sites on NAVSTA TI, in addition to the sites recommended for further investigation in Chapter 8 of the Draft Phase I RI report, to further characterize the nature and extent of contamination before remediation begins. The field work conducted at Sites 4/19, 5, 7, 12, 14, 15, 16, 20, 22, and 24 was described in the phase IIB RI field work plan addendum (PRC 1995).

4. **Comment:** For several sites the Navy concluded that there is no habitat currently available for ecological receptors. This conclusion fails to recognize the habitat of the adjacent San Francisco Bay.

Response: The text will be revised to state that no terrestrial habitat is currently available for terrestrial ecological receptors at these sites.

The aquatic habitat of the bay adjacent to NAVSTA TI was recognized in the Draft

Phase I RI report. In the Draft RI report, groundwater concentrations associated with terrestrial sites will be compared to Ambient Water Quality Criteria and San Francisco Bay Basin Plan discharge limits (Tables 15 and 17 in the Draft Phase I RI report), which are designed to protect marine communities. During the phase II RI activities, groundwater modeling is being performed to assess the impacts of contaminants in groundwater to surface water or the bay.

5. **Comment:** The Navy concludes that there is no beneficial use for the groundwater at NAVSTA TI. Potential beneficial uses have been identified for the groundwater. They are: (1) potential drinking water source (State Water Resources Control Board [SWRCB] Resolution No. 88-63) and (2) surface water replenishment (San Francisco Bay Basin Plan).

Response: The Draft RI report will be revised to include a discussion of the beneficial uses of the Bay.

In 1996, the RWQCB groundwater committee proposed the groundwater at NAVSTA TI be redesignated for agricultural, and industrial uses, and to no longer designate the groundwater as a potential drinking water source. This was presented in the RWQCB's "San Francisco and Northern San Mateo County Pilot Beneficial Use Designation Project Part I: Draft Staff Report."

6. **Comment:** The [U.S. Geological Survey] USGS survey used to establish soil ambient levels was insufficient. Comparison of on-site to off-site reference concentrations should rely on local documented background data for the San Francisco Bay Area. Attached to this letter are two documents that provide a local discussion on background levels.

Response: The Navy met with the EPA, DTSC, and RWQCB several times in March, April, and May 1994, to discuss the establishment of ambient levels at NAVSTA TI. These meetings were instigated by the Navy's submittal of both the Draft Phase I Remedial Investigation Report, dated November 8, 1993 and the Draft Proposed Approach to Establish Ambient Levels in Soils, dated March 3, 1994.

Using these two reports as a basis for discussion, the Navy and regulatory agencies decided to evaluate YBI and TI differently. At YBI, a background sampling plan was prepared and background samples were collected and analyzed to determine the levels of background inorganic constituents in soil. The data from "non-fill" sites on YBI (all sites except Site 11) were compared to the background data and those inorganic constituents that were detected at concentrations similar to or below those measured in the background samples were not considered chemicals of potential concern.

At TI and at Site 11, a "fill" site on YBI, all inorganic constituents in soil were to be compared with human health and environmental risk-screening values combined with reviewing the site history. Then the BCT would be able to make a management decision and eliminate certain inorganics from further evaluation at each site. The details of the approach for TI and YBI were provided in the Revised Draft Proposed Approach to Establish Ambient Levels in Soils, dated August 11, 1994 (PRC

1994b). The background sampling plan for collection and analysis of background samples on Yerba Buena Island was included in the Final Phase IIB Remedial Investigation Work Plan Addendum (PRC 1995).

In December 1995, DTSC informed the Navy that the agreed upon approach needed to be revised. DTSC reported that the planned screening approach to eliminate inorganics from the human health risk assessment could no longer be used. DTSC stated that it is not appropriate to eliminate chemicals of concern from the risk assessment based on screening with preliminary remediation goals. By eliminating chemicals of potential concern the risk assessment does not evaluate the cumulative risk. This approach had been planned as part of the inorganics ambient determination at Treasure Island. Instead, DTSC and EPA requested probability plots for all inorganics constituents. The probability plots incorporated inorganics results from all sites on Treasure Island. If the comparison of site data to the plots indicate that the constituent is truly ambient, then the constituent would be eliminated from further consideration. The Navy agreed that they would prepare the probability plots for all of the inorganics as requested except for the essential nutrients such as calcium, iron, magnesium, potassium, and sodium. After reviewing the probability plots, it was agreed that inorganics could be eliminated from further evaluation if the frequency of the results at a given site exceeded the ambient concentration was equal to or less than 10 percent.

7. **Comment:** The attenuation factor of 100 applied to Ambient Water Quality Criteria was incorrectly derived.

Response: The Navy is conducting groundwater modeling to determine potential impacts to the bay.

8. **Comment:** Quarterly groundwater monitoring is needed for all sites. Prior to initiating groundwater monitoring, a groundwater monitoring plan must be submitted and approved.

Response: Quarterly groundwater monitoring was recommended by the Navy in the Draft Phase I RI report. Quarterly groundwater monitoring, for a period of 1 year, was conducted at all existing wells in good condition at NAVSTA TI from November 1994 through November 1995. The sampling results of these four quarters is presented in the Groundwater Status Report: Summary of Groundwater Monitoring From November 1994 to November 1995, Naval Station Treasure Island, dated May 31, 1996. In addition, four quarters of sampling have been completed for the wells installed during the phase IIB RI (November 1995 through September 1996).

Additional sampling, beyond four quarters, has been presented in the Draft Interim Groundwater Monitoring Plan.

9. **Comment:** Site-specific data are needed to complete the qualitative phase of the NAVSTA TI Ecological Risk Assessment. This can be accomplished by performing a site walk.

Response: On June 3, 1994, a site walk was conducted by representatives from the Navy, EPA, RWQCB, and DTSC (PRC 1994c). During this site walk, these representatives agreed that the terrestrial system on NAVSTA TI does not require further field investigation because its extensive urban development generally prevents use by important ecological receptors.

In addition to the site walk, the Navy surveyed both TI and YBI on June 15 and 22, 1994 for threatened and endangered birds (PRC 1994c). A plant survey and bird survey were completed in the spring of 1996.

10. **Comment:** Burrowing animals should be considered when conducting the ecological risk assessment.

Response: Burrowing animals were addressed in the following sections of the Draft EA report:

- Section 2.2.2, NAVSTA TI, page 36, second paragraph.
- Table 7, BIRDS, REPTILES, AMPHIBIANS, AND MAMMALS OBSERVED OR BELIEVED TO EXIST AT NAVSTA TI, page 54.
- Section 3.1, Routes of Exposure, first paragraph.
- Section 5.1.2, Soil on Yerba Buena Island, subsection Receptors on YBI, second paragraph.
- Section 5.1.2, Soil on Yerba Buena Island, subsection Risk Characterization in Broad Ecological Context, second paragraph.

In addition, burrowing animals is a component of the model being used in the phase II EA terrestrial assessment.

11. **Comment:** The rare and endangered species associated with NAVSTA TI were not adequately addressed in the draft Ecological Risk Assessment.

Response: Rare and endangered species were addressed in Section 2.2.3 of the Draft EA report. The Navy surveyed both TI and YBI on June 15 and 22, 1994 for threatened and endangered birds (PRC 1994c). A plant survey and bird survey were conducted in the spring of 1996. In addition, the phase II EA includes literature reviews and consultations with local scientists to determine the actual usage of NAVSTA TI by rare and endangered species.