



Cal/EPA

Department of
Toxic Substances
Control

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TREASURE ISLAND
SSIC NO. 5090.3.A



June 4, 1997

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Ernesto Galang
900 Commodore Drive
San Bruno, CA 94066-2402

**DRAFT REMEDIAL INVESTIGATION REPORT ADDENDUM NO. 1 -
CONTAMINANT FATE AND TRANSPORT MODELING, NAVAL STATION
TREASURE ISLAND (APRIL 10, 1997)**

Dear Mr. Galang:

The San Francisco Bay Regional Water Quality Control Board (Regional Board), in conjunction with the Department of Toxic Substances Control, has reviewed the Draft Remedial Investigation Report Addendum No. 1, Contaminant Fate and Transport Modeling, Naval Station Treasure Island.

The State has concerns about the breakdown of solvents to vinyl chloride; definition of the point of compliance; generation of groundwater plume maps; elimination of TPH modeling where Benzene and Naphthalene were not detected; calculation of Dilution Attenuation Factors (DAFs); and accuracy of water quality criteria values. Specific comments are enclosed.

If you have any questions regarding this letter, please contact me at (510) 540-3769.

Sincerely,

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

enclosure

Mr. Ernesto Galang
June 4, 1997
Page Two

cc: Ms. Gina Kathuria
San Francisco Bay
Regional Water Quality Control Board
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To: Mary Rose Cassa
Project Manager, DTSC

Date: June 2, 1997

From: Gina Kathuria
Project Manager, RWQCB

SUBJECT: COMMENTS ON THE DRAFT REMEDIAL INVESTIGATION REPORT
ADDENDUM 1 CONTAMINANT FATE AND TRANSPORT MODELING,
NAVAL STATION TREASURE ISLAND, dated April 10, 1997

GENERAL COMMENTS

1. RWQCB understands the Navy's strategy to not consider natural biodegradation of contaminants to be conservative in the modeling of groundwater; however the breakdown of solvents to Vinyl Chloride is not evaluated. How will this pathway be modeled?
2. The point of compliance is not defined at the shoreline, but defined as the most inland point that is tidally influenced. Was this the approach that was used in this modeling effort? If not how does this affect the modeling results?
3. RWQCB is expecting groundwater plume maps to be included in the draft final RI. The inclusion of plume maps will aid in evaluating sites for the Feasibility Study.
4. Sites (4, 16, 17, 19, 20) where TPH modeling was eliminated because Benzene and Naphthalene were not detected may have to be modeled again once TPH ecological toxicity numbers are derived.
5. RWQCB was expecting that Dilution Attenuation Factors (DAFs) would be calculated for different zones within Treasure Island and Yerba Buena Island (similar to the San Francisco International Airport Order). The assigning of different DAFs for different zones within TI and YBI would enable the modeling of groundwater to be consistent among the different environmental programs at Naval Station TI. For example, the UST program could use this information to evaluate groundwater plumes related to USTs.
6. Results of the groundwater modeling for the "petroleum-only" sites should be included in the CAP.
7. Please evaluate the water quality criteria used to screen sites. There is a concern that some values may be inaccurate; for example, the appropriate screening value for Benzene should be 21 ppb (San Francisco Basin Plan) and for Lead should be 5.6 ppb.

SPECIFIC COMMENTS

8. Page 8, 1st Paragraph: Because ambient metals concentrations for groundwater were not derived, metals cannot be eliminated as contaminants of concern in groundwater. Metals in the groundwater must be modeled to assess potential threats to the Bay.
9. Page 13, 2nd paragraph: Please describe in more detail (1) the procedures used to calibrate the model, and (2) the data set used as input into the model.
10. Site 21, Vessel Waste Oil Recovery Areas: How will the breakdown of the solvents into Vinyl Chloride be modeled?

If you have any questions, I can be reached at 510-286-4267.