



Cal/EPA

June 5, 1997

Department of
Toxic Substances
Control

700 Heinz Avenue
Suite 200
Berkeley, CA
94710-2737

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

Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

DRAFT REMEDIAL INVESTIGATION REPORT ADDENDUM NO. 4,
REVISED REMEDIAL INVESTIGATION CONCLUSIONS AND
RECOMMENDATIONS, NAVAL STATION TREASURE ISLAND (APRIL
25, 1997)

Dear Mr. Galang:

The Department of Toxic Substances Control, in conjunction with the San Francisco Bay Regional Water Quality Control Board, has reviewed the Draft Remedial Investigation Report Addendum No. 4, Revised Remedial Investigation Conclusions and Recommendations.

In general, the State cannot concur with any recommendations or conclusions until comments are addressed on the Draft Remedial Investigation Report and Addenda 1 through 3. Specific comments are enclosed.

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

Sincerely,

A handwritten signature in cursive script that reads "Mary Rose Cassa".

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

enclosure

Mr. Ernesto Galang
June 5, 1997
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cc: Ms. Gina Kathuria
San Francisco Bay
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

Ms. Rachel Simons (SFD-8-2)
U. S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Ms. Martha Walters
San Francisco Redevelopment Agency
770 Golden Gate Avenue
San Francisco, CA 94102

Jim Sullivan, BEC
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Pat Nelson
Paul Hehn
ARC Ecology
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COMMENTS ON DRAFT REMEDIAL INVESTIGATION REPORT ADDENDUM NO. 4,
REVISED REMEDIAL INVESTIGATION CONCLUSIONS AND RECOMMENDATIONS,
NAVAL STATION TREASURE ISLAND (APRIL 25, 1997):

General Comments

1. The State cannot concur on any conclusions or recommendations until comments are addressed on the Draft Remedial Investigation Report and Addenda 1 through 3.
2. For planning purposes, the Navy should be aware that, in exercising our discretionary approval of the recommended removal actions, DTSC will be required to comply with the California Environmental Quality Act, which will likely require preparation of a Negative Declaration. For a Negative Declaration, DTSC must issue a public notice and allow thirty days for public comment. This public notice should be included in the Navy's public notice for the EE/CA or equivalent document, and the comment period should run concurrent with the Navy's public comment period for the EE/CA.

Specific Comments

1. Section 2.1, Site 05 - Old Boiler Plant: Given the presence of tetrachloroethene at 370 ppb at Site 5 and indications that vinyl chloride is present, it is premature to determine that this site requires no further action under CERCLA until cleanup goals are established.
2. Section 2.2, Site 07/10 - Pesticide Storage Area/Bus Painting Shop:
 - a. Please address the status of storm water catch basins with drain pipes that have been capped. Doesn't this pose a flooding problem?
 - b. The Navy should provide a map showing the two separate areas of contamination so that the proposed recommendations can be distinguished.
3. Section 2.4, Site 11 - Yerba Buena Island Landfill:
 - a. The first paragraph should include pipelines as the possible source of petroleum contamination. It would be more accurate to attribute metals contamination to vehicle emissions from the Bay Bridge, rather than just car emissions.
 - b. The description of the distribution of TPH contamination in the second paragraph should specify which edge of the landfill has the highest TPH contamination.
4. Section 2.6, Site 17 - Tanks 103 and 104: It would be clearer to state in the second paragraph, ". . . to determine if VOCs may be migrating downgradient from Site 05."

5. Section 2.8, Site 24, Fifth Street Fuel Release/Dry Cleaning Facility: The Navy should consider using detailed sampling through profile sampling or multi-level sampling to further evaluate chlorinated hydrocarbon contamination and evaluate remedial alternatives for groundwater.