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Ser6225EG/L8077  
30 Dec 1997

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

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

Encl: (1) Response to Agency Comments on Addendum No. 2 to the Draft  
Remedial Investigation (RI) Report

1. Enclosure (1) is provided for your information. Comments were received from Cal/EPA Department of Toxic Substances Control, in conjunction with the San Francisco Bay Regional Water Quality Control Board.
2. Addendum No. 2 summarizes the results of additional field sampling conducted at Sites 12 and 17. The information presented in addendum 2 has been incorporated into the draft final RI report dated September 1997. Accordingly, a final addendum 2 will not be prepared.
3. Thank you for your guidance and involvement in this project. For further information, please call me at (650) 244-2560.

Originated by:

ERNESTO M. GALANG  
By direction of  
the Commanding Officer

Distribution:

California Department of Toxic Substances Control (Attn: Mr. David Rist)  
California Regional Water Quality Control Board (Attn: Mr. David Leland)  
U.S. Environmental Protection Agency, Region IX (Attn: Mr. James Ricks, Jr.)  
San Francisco Redevelopment Agency (Attn: Ms. Martha Walters)  
Tetra Tech EM Inc. (Attn: Mr. Richard Knapp)(w/o encl)

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**RESPONSE TO AGENCY COMMENTS  
ON THE DRAFT REMEDIAL INVESTIGATION REPORT,  
ADDENDUM NO. 2 -- ADDITIONAL CHARACTERIZATION AT SITES 12 AND 17  
NAVAL STATION TREASURE ISLAND**

This document presents the Navy's responses to comments from the Department of Toxic Substances Control (DTSC) on the draft "Remedial Investigation (RI) Report, Addendum No. 2 -- Additional Characterization at Sites 12 and 17, Naval Station Treasure Island." DTSC's comments were prepared in conjunction with the San Francisco Bay Regional Water Quality Control Board (Regional Board) and reflect the concerns of that agency as well. Addendum 2 was submitted to the regulatory agencies on April 15, 1997; DTSC's comments were received on May 21, 1997. The information presented in addendum 2 has been incorporated into the draft final RI report dated September 1997. Accordingly, a final addendum 2 will not be prepared.

1. **Comment:** For Site 12, the widespread, low-level contamination is described as a regional groundwater plume (pages 5 and 8). It would be more accurate to describe the plume as diffuse, considering the scale of the site. DTSC and the Regional Board look forward to reviewing the draft work plan for supplemental investigation at Site 12.

**Response:** The Navy concurs. The groundwater plume is not referred to as "regional" in the draft final RI report.

The draft work plan for supplemental investigation at Site 12 was submitted to the regulatory agencies on August 12, 1997. The final work plan and the response to agency comments on the draft work plan were submitted on September 17, 1997.

2. **Comment:** In the Site 17 field sampling approach, please list the new Geoprobe location numbers.

**Response:** The new Geoprobe location numbers are listed in section 13.4.2 of the draft final RI report.

3. **Comment:** Given the presence of tetrachloroethene at 370 ppb and indications that vinyl chloride is present, it is premature to determine that this site should be regulated as a petroleum-only site until cleanup goals are established.

**Response:** In the Regional Board's report "San Francisco and Northern San Mateo County Pilot Beneficial Use Designation Project," groundwater at Naval Station Treasure Island (NAVSTA TI) was recommended for de-designation as a municipal and domestic supply and therefore is not suitable for use as a drinking water source. Because it is anticipated that the existing water supply service to NAVSTA TI will continue and that groundwater will not be used in the future, direct contact with groundwater was not evaluated in the baseline human health risk assessment.

Volatile organic compounds (VOC) that are present in groundwater and/or in soil and that may migrate through soil to air were evaluated in the human health risk assessment using air samples collected from flux chambers at Sites 06, 22, and 24. These three sites were selected as "worst-case" sites due to (1) the high VOC concentrations in site soils and groundwater, relative to other NAVSTA TI sites; (2) the large estimated volatilization potential of the specific VOCs found in soil and groundwater at the sites; and (3) the high toxicity of those VOCs. Any VOCs in air at Sites 05 and 17 are expected to pose a lower risk of exposure through inhalation than Sites 06, 22, and 24, where flux chamber samples were obtained. Furthermore, the outdoor air VOC concentrations estimated for Sites 06, 22, and 24 are significantly lower than the U.S. Environmental Protection Agency (EPA) Region IX ambient air preliminary remediation goals (PRG). As a result, VOCs are not human health chemicals of concern (COC) at Sites 05 and 17.

The results of groundwater modeling to simulate the fate and transport of ecological chemicals of potential concern (COPC) are presented in the draft final RI report. Ecological COPCs are defined as chemicals whose concentrations exceed the EPA ambient water quality criteria (AWQC) for marine life. VOC concentrations in groundwater at Sites 05 and 17 do not exceed the AWQC values. Vinyl chloride does not have an AWQC value, so it is not considered an ecological COPC.

The recommendation that Site 17 be regulated as a petroleum-only site was based on the analysis of the risks associated with the VOCs at the site and the conclusion that VOCs do not pose a human health or ecological risk.

4. **Comment:** For the purposes of estimating contaminant mass at Site 17, the Navy should reconsider the iso-concentration contours drawn in Figure 6.

**Response:** VOCs in groundwater at Sites 05 and 17 are not considered human health or ecological COCs for the reasons cited in the response to Comment 3. The draft final RI report includes isoconcentration maps only for COCs. As a result, no revision has been made to Figure 6, "Sites 05 and 17 PCE Groundwater Concentration Map."

5. **Comment:** DTSC and the Regional Board anticipate that all new data included in Addendum 2 will be incorporated into the risk assessment in the Draft Final Remedial Investigation Report.

**Response:** The new data have been incorporated into the risk assessment in the draft final RI report.