



# Department of Toxic Substances Control

Jesse R. Huff, Director  
700 Heinz Avenue, Bldg. F, Suite 200  
Berkeley, California 94710-2721

N60028\_000890  
TREASURE ISLAND  
SSIC NO. 5090.3.A



Pete Wilson  
Governor

July 27, 1998

Peter M. Rooney  
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 ADDITIONAL CHARACTERIZATION OF DIOXINS FIELD SAMPLING PLAN ADDENDUM FOR SITE 12, NAVAL STATION TREASURE ISLAND**

Dear Mr. Galang:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Additional Characterization of Dioxins Field Sampling Plan Addendum for Site 12 dated July 13, 1998. DTSC has the following comments:

1. Page 1, Section 2.0, Background

Please add the former incinerator to the list of areas investigated during the Remedial Investigation sampling events and include a discussion of the rationale for conducting additional characterization at Site 12.

2. Page 2, Section 3.0, Objectives

The first sentence of this section is not an objective and should either be deleted or moved to the background section of the report.

The entire last paragraph of this section beginning with "It should be noted..." should be deleted or moved to another section of the report as it is also not an objective. If the Navy chooses to move this information to another part of the report, DTSC believes the discussion on the risk assessment should be modified.

The initial risk calculation for Dioxins at Site 12 was based on a limited number of samples of which most were surface samples. The proposed additional sampling will be performed not only to characterize the vertical and lateral extent of Dioxins at Site 12, but also to

Mr. Ernesto M. Galang  
July 27, 1998  
Page 2

provide a robust data set for risk calculation that includes additional sub-surface samples.

The last sentence of this section beginning with " Consequently, the additional..." is misleading and needs clarification. It implies that the main purpose is to confirm what is already known about Dioxins at Site 12. Again, DTSC believes that the purpose is to define the lateral and vertical extent of contamination in areas that are known to be contaminated with Dioxins and to determine whether other areas, that were recently identified in an aerial photograph review, contain Dioxins that could pose unacceptable risks.

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

Sincerely,



David Rist  
Hazardous Substances Scientist  
Office of Military Facilities

cc: Mr. David Leland  
California Regional Water Quality Control Board  
2101 Webster Street, Suite 500  
Oakland, California 94612

Mr. James Ricks Jr. (SFD-8-2)  
U. S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, California 94105

Ms. Martha Walters  
Mayor's Office at Treasure Island  
770 Golden Gate Avenue  
San Francisco, California 94102

Mr. James B. Sullivan  
Caretaker Site Office  
Treasure Island  
410 Palm Ave., Room 161  
San Francisco, California 94130-0410

*Richard Knapp (Tetra Tech EMI)  
Admin Record (3 copies)*

*Richard Hansen  
Paul Hehn  
Pat Nelson  
John Allman  
Nathan Brennan  
Dale Smith  
Arc Ecology*

} Community  
RAB