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Ser 6225EG/L9307-1  
3 Nov 1998

**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) Restoration Advisory Board (RAB) Final Meeting Minutes – 21 July 1998  
(2) Restoration Advisory Board (RAB) Final Meeting Minutes – 18 August 1998  
(3) Restoration Advisory Board (RAB) Final Meeting Minutes – 15 September 1998

1. Enclosures (1), (2), and (3) are the approved and final Restoration Advisory Board (RAB) meeting minutes and are provided for your file and information.
2. Thank you for your guidance and involvement in this project. For further information, please call me at (650) 244-2560.

*Original signed by:*

ERNESTO M. GALANG  
REMEDIAL PROJECT MANAGER  
By direction

**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)  
Geomatrix Consultants ( Attn: Ms. Carol Yamane)  
Tetra Tech EM Inc. (Attn: Mr. Richard Knapp)

**Community RAB Members:**

|                                 |                      |                    |
|---------------------------------|----------------------|--------------------|
| Mr. James Aldrich               | Ms. Alice LaPierre   | Mr. Jack Savage    |
| Mr. John Allman (Alt Co-Chair)  | Mr. Clinton Loftman  | Ms. Dale Smith     |
| ARC Ecology (Mr. Saul Bloom)    | Mr. Brandon McMillan | Ms. Usha Vedagiri  |
| (Ms. Chris Shirley/Kavitha Rao) | Ms. Karen Mendelow   | Mr. Harlan Van Wye |
| Mr. Nathan Brennan              | Mr. Ernest Michelsen | Mr. Humphrey Ho    |
| Mr. Richard Hansen (Co-Chair)   | Ms. Patricia Nelson  | Mr. John Gregson   |
| Mr. Paul Hehn                   | Mr. Henry Ongerth    |                    |

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**NAVAL STATION TREASURE ISLAND  
RESTORATION ADVISORY BOARD MEETING MINUTES**

Tuesday, 21 July 1998  
Meeting No. 47

The Naval Station Treasure Island (NAVSTA TI) Restoration Advisory Board (RAB) met on 21 July 1998 at 7:00 p.m. at Casa de la Vista, NAVSTA TI. The goals of the meeting were to: 1) have discussion/approval of the 19 May 1998 and the 16 June 1998 minutes, 2) receive a report from the City of San Francisco, 3) review the Draft Zone 4 IR Site 12 Investigation Work Plan, 4) introduce the Finding of Suitability to Transfer (FOST) for Sites Not Requiring Remedial Action 5) discuss the draft Offshore Remedial Investigation (RI) Report, 6) discuss general updates, 7) review action items, 8) attend to organizational business, 9) review the upcoming environmental report review schedule, 10) provide open questions and discussion, and 11) review the proposed agenda items for upcoming RAB meetings and new action items.

These minutes summarize topics discussed during the RAB meeting. A copy of the meeting agenda is provided as Attachment A, the attendance list is provided as Attachment B and the meeting handouts are provided as Attachment C.

**I. Welcome Remarks and Agenda**

James B. Sullivan, BRAC Environmental Coordinator (BEC) and Navy Co-Chair called the meeting to order at 7:10 p.m., and welcomed all meeting attendees. There were no comments on the meeting agenda.

**II. Public Comment**

Mr. Sullivan noted that there were no members of the general public present at the meeting.

**III. Discussion/Approval of the 19 May 1998 and 16 June 1998 Minutes**

Mr. Sullivan noted only five community RAB members in attendance and asked for guidance in whether to proceed with discussion and approval of the previous meeting minutes. Paul Hehn recommended that the minutes be addressed at this meeting.

Jack Savage noted that Figure 7-18 was not included in the June minutes mailing. Mr. Sullivan stated that a copy would be included in the July mailing.

Kavitha Rao noted that the last sentence in the first paragraph on page 8 of the May minutes should be restated to read "intention to have the wetlands evaluated as an alternative in the EIR/EIS". She also asked that the second paragraph from the bottom on page 12 of the May

minutes should be rephrased to read that Ms. Shirley would give the "RAB Technical Subcommittee" a list for discussion.

The May and June minutes were approved with the above corrections.

#### **IV. City of San Francisco**

Mr. Sullivan noted that this agenda item is set aside for the City of San Francisco to discuss ongoing City issues. Since Martha Walters was not able to attend tonight's meeting, the RAB would pass on this item until next month.

#### **BRAC CLEANUP PROCESS:**

#### **V. Draft Zone 4/IR Site 12 - Draft Site 12 Investigation Work Plan**

Richard Knapp, Tetra Tech EMI, briefly summarized the contents of two work plans for IR Site 12. One document outlines an investigation to further delineate total petroleum hydrocarbons (TPH) at IR Site 12, and the other document involves dioxin sampling at IR Site 12.

##### **TPH Work Plan**

Mr. Knapp noted that the determination of TPH screening levels is an issue that has been around for quite a while. TPH screening levels are being negotiated between the Regional Water Quality Control Board (RWQCB) and the Navy in an effort to reach an agreement. Currently, the Navy's proposed screening level for total TPH in groundwater is 22 Mg/L; the RWQCB proposes a 1.4 Mg/L total TPH screening level. He explained that Total Petroleum Hydrocarbons (TPH) refers to the sum of petroleum components such as gasoline, diesel, and motor oil, found in groundwater or soil.

Mr. Knapp stated that the objectives of the investigation are to key in on portions of Site 12 with TPH levels in groundwater that are greater than 1.4 Mg/L; determine TPH concentrations in soils in these areas; possibly install monitoring walls; and also investigate a previous MTBE detection at one location.

Mr. Knapp noted that there are nine locations where TPH greater than 1.4 Mg/L will be resampled for groundwater and soil. Much of the TPH data was originally gathered in 1995, and so resampling will show whether concentrations have increased, decreased or remain the same. In addition, 12 new borings in the vicinity of the above locations; upgradient, downgradient and laterally, will be sampled for TPH in groundwater and soil.

Mr. Knapp explained that three soil samples will be collected at each location; one about 1.0 to 1.5 feet below ground surface, one just above the water table, and one saturated sample approximately two feet below the water table. He noted that the groundwater at Site 12 is fairly shallow and that right now, we are probably in a time of somewhat high groundwater. Laboratory

analysis for TPH will include gasoline (purgeables), diesel and motor oil (extractables), and volatile organic compounds (VOCs) including MTBE.

### **Dioxin Sampling Work Plan**

Mr. Knapp stated that samples were collected for dioxin during the Remedial Investigation. Seven samples collected at three to five feet below ground surface were taken from areas targeted as likely to contain dioxin; an incinerator and a disposal area. Two samples had very low, but detectable concentrations of dioxin. Geomatrix, a consultant for the City of San Francisco, also recently collected samples at 1.3 feet below ground surface. Twelve of their fifteen samples also contained detectable concentrations of dioxin.

Mr. Knapp stated that the objectives of the work plan are to conduct more sampling to better characterize the vertical and lateral distribution of dioxin, and to sample for dioxin at possible debris disposal areas and a burn pit as indicated from historic aerial photographs. These sites had not been sampled previously for dioxins.

Mr. Knapp concluded by noting that field work will begin for both the TPH and dioxin investigations in August. The data review will be conducted in September, followed by a separate draft memoranda for TPH and Dioxins to be completed in October. The information will then be included in the Site 12 OU RI Report.

### **RAB Discussion on the TPH and Dioxin Work Plans**

Mike Michelsen asked if there were any surprises in the results of the earlier sampling. Mr. Knapp stated that dioxin was expected at the incinerator site but none was detected in the five samples taken, however there was some detection at the debris disposal areas. He noted that the boring logs identified burned wood and that with burning there is a potential to generate at least some dioxins. He added that the fifteen samples collected by the City had dioxin levels similar to those detected by the Navy samples.

Mr. Hehn asked what the source was of the one Geomatrix dioxin detection in the southeast corner of the site. Mr. Knapp replied that there is no answer, that there was no indication in the aerial photographs, and that the detection was only slightly above the EPA natural background of 10 pg/g. Additional samples are being taken at this site.

Mr. Hehn asked why the Navy's screening level for total TPH changed from the original 14.3 Mg/L to 22 Mg/L in the TPH Work Plan. Mr. Knapp responded that two factors caused the screening level to rise from 14.3 Mg/L to 22 Mg/L - the RWQCB uses a more conservative number for the effective concentration, and also asked that more samples be included in the analysis. Mr. Sullivan pointed out that the screening level is a derived number and that discussion over time between RWQCB and the Navy resulted in adjustments to the calculations, leading to the Navy's present number. He added that the Navy met with the RWQCB today and had a good round of discussion on the issue. An agreement may be reached pending approval by management. Mr. Sullivan pointed out that the issue is a regional one, and not just specific to TI.

Mr. Hehn asked about the level of the previous MTBE detection. Mr. Knapp replied that the MTBE detection was about 400 Mg/L. Mr. Sullivan noted that the level was surprisingly high and speculated that the source may have been gasoline spilled by a resident on the soil. Additional samples will be taken around that location.

Mr. Hehn asked if the TPH sampling was from monitoring wells or from geoprobe. Mr. Knapp stated that sampling was predominantly from geoprobe, but included monitoring well sampling, too. Mr. Sullivan noted that every hydropunch sample with elevated values will be resampled at the same location.

Mr. Hehn asked about the sampling depths for the planned dioxin sampling since the Navy and the Geomatrix sample depths appear to differ. Mr. Knapp responded that the sampling depths will be the same as in the previous sampling - at both shallow depths and also close to the water table. He noted that samples are preferred as shallow as possible for human health risk assessment; a 1.0 to 1.5 foot depth should be sufficient. Two feet is used as an approximate level at this site of where soil may have been redistributed, which is why the Navy took deeper samples. Mr. Hehn stated that if below one foot, it may be below whatever fill material was brought in. Mr. Knapp said that Mr. Hehn's point was well taken, and he added that with the planned collection method, the entire soil column can be seen and that the samples can be selected from it.

Mr. Sullivan announced that the comment period for the two work plans would be extended to the August 3 interim meeting, from the originally scheduled July 27 date.

## **VI. Introduction to Finding of Suitability to Transfer (FOST) for Sites Not Requiring Remedial Action**

Mr. Sullivan explained that the FOST involves the transfer of property for future reuse. TI is starting the FOST process by first looking at those parcels previously screened as not requiring remedial action.

Lynne Srinivasan, Uribe and Associates, presented a new map that divides TI and YBI into five different transfer areas. She noted that this is different from the previous lease zones. She indicated Transfer Area Phase Ia on TI and Transfer Area Phase Ib on YBI. She also pointed out a change in terminology under the FOST process, noting a Supplemental Environmental Baseline Survey (SEBS) in place of a Site-Specific Environmental Baseline Survey (SSEBS) under the FOSL process.

Ms. Srinivasan identified six steps in the FOST process as outlined in the DoD/EPA document, *Fast Track to FOST*. These are:

- Step 1 - Notify regulatory agencies and BRAC Cleanup Team (BCT) of intent to initiate FOST process
- Step 2 - Evaluate property for transfer
- Step 3 - Determine suitability of the property for transfer and prepare draft FOST

Step 4 - Notify agencies, BCT, and public of intent to sign FOST

Step 5 - Complete and sign FOST

Step 6 - Notify public of FOST signature

Harlan Van Wye questioned why a public hearing is not part of the FOST process. Ms. Srinivasan stated that there is no official hearing, however a large ad will be placed in the *San Francisco Chronicle* informing the public that the FOST is available for review. A copy will be placed in both information repositories and there will be a 30 day comment period. All comments will be responded to; unresolved comments are required to be attached to the FOST. The comments will be discussed by the Navy, the regulatory agencies and the BCT.

Mr. Van Wye wanted to note the importance of the 30 day public comment period.

Ms. Srinivasan reviewed the status of the six step FOST process as specific to TI and YBI:

**Step 1 - Notification of Intent to Initiate**

The Navy notified the BCT of the intent to sign a FOST for the first five transfer phases on June 30, 1998 for TI and YBI.

**Step 2 - Evaluate Property**

Some transfers of property have already occurred on TI as federal to federal transfers, from the Navy to both the Coast Guard and the Department of Labor. Both sites have petroleum issues and those federal agencies will work with the Navy to ensure cleanup, but they are not a part of the FOST process since they are no longer DOD property.

An EBS or SEBS will be prepared for each of the first five transfer phases. Environmental condition of property (ECP) area types will be determined, based on results of the EBS or SEBS. Previous information gathered for the zones and parcels will be used in developing the EBS, SEBS and ECP area types. The ECP area types include:

- Category #1: Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
- Category #2: Areas where only release or disposal of petroleum products has occurred.
- Category #3: Areas where release of hazardous substances has occurred, but at concentrations below action levels that do not require a removal or remedial action.
- Category #4: Areas where release of hazardous substances has occurred, and all remedial actions necessary to protect human health and the environment have been taken.
- Category #5: Areas where release of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken.

Category #6: Areas where release of hazardous substances has occurred, but required actions have not yet been implemented.

Category #7: Areas that are not evaluated or require additional evaluation.

Ms. Srinivasan noted that there are no longer any ECP Area Type 7's on TI.

Ms. Srinivasan stated that the first five phases of property transfer to include:

Phases Ia and Ib - ECP Area Type 1 parcels at TI and YBI, respectively. There are 50 proposed ECP Area Type 1 parcels included in Phase Ia and 13 proposed ECP Area Type 1 parcels included in Phase Ib. ECP Area Type 1 parcels will be agreed to by the BCT before development of the draft FOST.

Phases IIa and IIb - ECP Area Type 2 parcels. These parcels have not yet been identified, but will be coordinated with the BCT, and based on recent petroleum reports.

Phase III - ECP Area Type 3 and 4 parcels. These parcels have also not yet been identified, but will be coordinated with the BCT, based on agreement that constituents were detected below action levels (ECP Area Type 3) or all necessary remedial action has been taken (ECP Area Type 4).

### **Step 3 - Prepare Draft FOST**

The FOST will include a statement that the property is suitable for transfer, and any restrictions on future use. It is not anticipated that the Phase Ia and Ib FOST will include future use restrictions because the parcels are all ECP Area Type 1.

### **Step 4 - Notification of Intent to Sign**

The public will be notified of the intent to sign the FOST through an announcement in the *San Francisco Chronicle* before issuing the draft FOST. The draft FOST will be placed in the information repositories for a 30 day public comment period.

### **Step 5 - Complete and Sign FOST**

Comments from the public and the BCT will be addressed; unresolved comments will be attached to the draft final FOST. The draft final FOST will be submitted to the BCT for final review. Comments will be addressed and the final FOST signed.

### **Step 6 - Notification of FOST Signature**

The Navy will notify the BCT and public of the FOST signature through an announcement in the *San Francisco Chronicle*. The signed FOST will be available in the information repositories.

Ms. Srinivasan stated that the FOSTs must tie into the EIS/EIR process. The FOSTs prepare the property for transfer, however the property cannot be transferred until the EIS/EIR is complete and a National Environmental Policy Act (NEPA) Record of Decision (ROD) is signed. Mr. Sullivan stated that the draft EIS/EIR is scheduled to be issued this fall. Mr. Sullivan added that a

real estate agreement must also be reached between the Navy and the City prior to property transfer.

Ms. Srinivasan reviewed the schedule as follows:

Phase Ia

|            |                                 |
|------------|---------------------------------|
| draft SEBS | August 10, 1998 (30 day review) |
| draft FOST | October 26, 1998                |

Phase IIa

|            |                   |
|------------|-------------------|
| draft SEBS | September 1, 1998 |
| draft FOST | November 25, 1998 |

Mr. Michelsen asked whether any of this appears in the Federal Register. Ms. Srinivasan and Mr. Sullivan both said that they did not think so. Mr. Michelsen added that the Register is where most people look for issuances by the Federal Government for comment periods and other kinds of transactions.

Richard Hansen, Community Co-Chair, noted that the FOST dates are not far off and asked if the City would then wait for the transfer before leasing out the housing. Mr. Sullivan responded that deed transfer probably won't occur until sometime in 1999, and has to wait until there is a signed NEPA EIS ROD. Mr. Hansen asked if the FOST is more stringent than the FOSL. Mr. Sullivan noted that it may be more protective because it represents the final review of the property, and has to conform to the future reuse of the property. He added that the FOST should not affect the leasing schedule; it is a step the Navy is taking to be ready for property transfer when the EIS/EIR and real estate agreement is finalized. Mr. Hansen asked if residents would be moving into the housing after Thanksgiving. Mr. Sullivan pointed out that the first FOST does not include Site 12.

Ms. Srinivasan added that the lease document is essentially more stringent than the transfer document because the preparatory environmental documentation for the leasing process included a lot of use restrictions.

Mr. Van Wye pointed out that the TI Development Authority is considering three marina development proposals, from small scale to large scale, and asked when that area would be ready for transfer. Mr. Sullivan stated that this area was discussed in the meeting with the Regulators this morning. Areas Ia and Ib are without outstanding environmental issues and will be transferred first. He noted that not many bases have gone through the FOST process and so Areas Ia and Ib will provide a trial run for TI. He added that there are some cleanup issues associated with the marina area, and the Navy has to determine how to expedite the petroleum issues. Discussions have been held with the City, and the waterfront area is recognized as the next most important area for the City following the housing area. One marina developer has proposed a schedule that they reach agreement with the City in 1998, conduct the planning and engineering in 1999 and begin construction in 2000. The Navy may be able to accommodate this schedule for the cleanup of the onshore area, and possibly reach a no action ROD in 1999 for the offshore area.

Mr. Hansen asked if the prospective developers are requesting 50 or 100 year leases from the City. Mr. Van Wye indicated he thought the City would provide long-term leases with options to renew and that the City would own the underlying land. He stated that the developers seemed eager to move forward with plans, and he encouraged the Navy to move the process along as quickly as possible to accommodate their interest. He noted that the marina is in a bad state of disrepair.

Mr. Sullivan stated that the proposed five phases of the FOST schedule is based on handling the easiest sites first because they are considered clean from contaminants, followed by the more difficult ones, which involve more complex contamination issues. The FOST schedule could, however, be adjusted to match the parcel sizes and schedules of proposed development, such as the marina, as they come up. Mr. Van Wye recommended that the Navy adjust the FOST schedule to take the marina development into consideration.

Mr. Hehn asked for clarification in the recombination of parcels under the FOST process. Ms. Srinivasan stated that previously, there were multiple ECP area type categories within each zone. Under the FOST process, the parcels have been reorganized so that all of the same ECP area types are grouped together to make transfer easier. The FOST and FOSL processes are proceeding on similar tracks but are somewhat different. Mr. Sullivan added that the FOST was envisioned from the beginning to be the final assessment of the property before transfer.

Mr. Van Wye asked how the transfer arrangement will work with the offshore areas of Clipper Cove and whether they would be covered under a separate FOST. Mr. Sullivan replied that the process is less clear on submerged lands. Mr. Van Wye noted concern by the T.I. Development Authority over alignment of the new Bay Bridge and possible infringement on Clipper Cove. Mr. Sullivan stated that the Navy is documenting the offshore areas under investigation. Mr. Van Wye posed the question of whether transfer of development rights over the water would be included with transfer of the onshore area. Mr. Sullivan acknowledged that the issue does raise questions as to what type of FOST boundary might occur with submerged lands.

Mr. Hehn asked if a list of properties would be provided to the RAB, along with a map. Ms. Srinivasan stated that these are included in the SEBS which will be available on August 10. Mr. Sullivan noted that the SEBS won't look that much different from the SSEBS for the FOSL. It is the same type of documentation and will include all available information on the property, including IR, UST and fuel line information.

Mr. Hehn recommended that the SEBS information be presented at an interim meeting, prior to the RAB meeting, because there may be controversy over some of the parcels. Ms. Srinivasan stated that the Phase Ia information was planned for presentation to the RAB at next month's meeting. Mr. Sullivan noted that the Navy is not trying to force the process through and is simply trying to get the process started with those parcels that require no remedial action. He added that the regulatory agencies and the RAB will have the opportunity to comment throughout, and that if need be, the schedule can be adjusted. Mr. Hehn requested that the Navy begin discussions as early as possible prior to the 30 day comment period to give the RAB time to review the information. Ms. Srinivasan noted that there will be plenty of time to make changes to the draft

SEBS before a final SEBS is issued and that could include parcel boundary changes and marina parcels. Mr. Sullivan pointed out that although the issuance of the draft SEBS is fixed, the rest of the schedule is subject to change.

Mr. Hehn asked for clarification on the potential for "dirty transfer" of petroleum hydrocarbon sites. Mr. Sullivan responded that CERCLA law requires the U.S. EPA to sign off with the Navy before transfer occurs. David Rist, DTSC, stated that 120(h)(3) of CERCLA requires that the EPA sign off with the Navy that all remedial action has been taken as necessary. He noted that the Navy is not generally willing to transfer the property unless they can ensure this has been done, whether it is a CERCLA or petroleum issue. Ms. Srinivasan stated that there is a detailed process which allows for the transfer of a petroleum contaminated piece of property, since petroleum sites don't fall under the guidance of CERCLA. She added that petroleum sites with above action levels need to be discussed further, and that the discussions can follow issuance of the draft SEBS.

Mr. Hehn asked who carries the liability in such situations. Mr. Rist noted that the Navy has indicated in the past that they are not willing to transfer petroleum-contaminated property due to liability concerns, and are addressing the issue. He added that the Regional Water Quality Control Board (RWQCB) is another factor and is likely unwilling to sign an agreement until the petroleum level is acceptable to the agencies and the public. Ms. Srinivasan stated that a transfer of this sort is generally prompted by the recipient and their interest in the early transfer of the property.

Mr. Hehn noted that he could envision the issue of transfer of a petroleum-contaminated site occurring with plans for development of the marina area by the City. Mr. Van Wye stated that the marina has been the first area where the City has had serious development plans and recommended that the area be moved into the Phase Ia process. Mr. Hansen asked who is actually responsible for cleanup if the Navy doesn't own Clipper Cove. Mr. Sullivan responded that the Navy skeet range and stormwater outfalls are sources of contamination for the cove, and so the Navy is the responsible party. He added that Clipper Cove is considered Navy property.

## **VII. Draft Offshore Remedial Investigation Report Discussion**

Mr. Sullivan stated that the 60 day comment period for the draft Offshore RI Report ends on August 7, so this is the last regular RAB meeting before the comment period closes. He explained that the Offshore RI includes all the submerged areas around the island, and combines both the skeet range and stormwater outfall investigations into one document. Kavitha Rao invited RAB members to attend a discussion session on the offshore documents next Tuesday or Thursday at 6:30 p.m. at the ARC Ecology office.

Ms. Rao asked for an explanation of the reasoning in choosing a reference maximum instead of an average or a 95 percent. Cindi Rose TtEMI, responded that the reference area represents an area not impacted by any contamination. Taking an average will still fall within the area of

contamination, but going above the reference maximum would be outside the area of contamination. Ms. Rao stated that using a reference maximum does not seem to be the most conservative approach. Ms. Rose replied that the reference maximum is still within a clean area. Mr. Sullivan explained further that although the reference area is clean, it still has a chemical makeup. There is an average concentration of chemicals and a maximum concentration of chemicals within the area. The Navy has chosen to use the maximum concentration, however it has been suggested that the average concentration be used. The lower the reference number used, then the more potential chemicals that will show up.

Mr. Van Wye noted that, upon brief review of the Technical Memorandum, it doesn't appear there are a lot of problems with Clipper Cove. Ms. Rose agreed and stated that tissue samples will be collected to confirm this.

Ms. Rao questioned why humans are not used as an endpoint regarding fish consumption as part of the risk assessment in Section 11 of the document. Mr. Van Wye stated that there is no fishing off of Clipper Cove. Nathan Brennan pointed out that once the area is accessible, people may come there to fish. Ms. Rose recognized that humans do need to be addressed and that there is no pathway to humans except through fish consumption. She noted that the concern is being addressed at the regional level, because no direct path can be traced specifically to TI since fish are migratory. Mr. Knapp noted that Section 3 of the draft final Onshore RI report addresses human health aspects and briefly explains why fish consumption is not included as a pathway.

Ms. Rao noted that last week the Coast Guard had cited some fisherman for fishing off the coast of an IR site at Hunters Point.

Mr. Hehn referred to the results of the Area C porewater bioassay results which were rejected because ammonia caused toxicity to the amphipods. Ms. Rose indicated the ammonia toxicity was a result of the microbial process in the lab and not the result of toxins in the sediment. She pointed out that minimum survival in the reference area is 45 percent, and noted a correlation with the percentage of fine grained sediments at the site. Low survival is likely attributable to a high percentage of fine grained sediments. Mr. Hehn pointed out, and Ms. Rose concurred, that it is not really possible to definitely say that the amphipods died due to the fine grained sediments.

Ms. Rao suggested that the choice of benthic feeding birds should include diving ducks because they are more exposed to sediment. Ms. Rose stated that she would have to look into their diving depths, and that willets were chosen because they are exposed to shoreline sediments.

Ms. Rao asked where the sample collection attempts were made in Area F. Ms. Rose indicated the samples were attempted to be collected off the outfalls, but bedrock was encountered in these locations. She noted that field notes are included in the appendix. Ms. Rao stated that the maps don't seem to correspond to areas noted in the text as erosional.

Ms. Rose stated that tissue collection is scheduled to begin on August 10, and comments can be made before field work begins. Mr. Sullivan noted that comments can also be made during the August 3<sup>rd</sup> interim meeting. The next document will be a Draft Final Offshore Report.

Mr. Hehn asked that tissue samples be collected around the base of the west side of the Bay Bridge. Ms. Rao asked about ownership of the Coast Guard property. Mr. Sullivan stated that the Coast Guard owns the property. Mr. Van Wye noted that the area west of the bridge gets regularly flushed by the tidal action of the bay and so contaminants are not likely to collect there, and is not likely to require tissue sampling. Mr. Hehn stated he was concerned about the beach areas along the shoreline on the west side of YBI and south of the Bay Bridge. Mr. Van Wye pointed out that these areas are totally inaccessible to people and are only used by seals and birds.

### **VIII. Update of Schedule for Petroleum and CERCLA Investigation Reports**

Mr. Sullivan distributed a copy of the document schedule recently updated. He reviewed the major items:

- Onshore RI Report
- Site 12 OU
- Onshore Feasibility Study
- Corrective Action Plan for Nine Petroleum Sites
- Interim Groundwater Monitoring
- No Remedial Action Plan for Sites 1 and 3
- Onshore Remedial Action Plan
- Offshore Remedial Investigation
- Offshore Feasibility Study
- Offshore Remedial Action Plan

He noted that the schedule includes all the IR sites but not the fuel line and smaller UST sites or the FOSLs and FOSTs. He added that the Navy will try to update the schedule more regularly.

### **PROGRAM UPDATES:**

#### **IX. General Updates**

##### **Announcements**

There were no general announcements.

##### **FY98 Project Execution Plan**

Mr. Sullivan stated that he would update the schedule at a later date.

##### **Report on the June BRAC Cleanup Conference**

Mr. Sullivan reported that the West Coast BRAC Cleanup Conference was held in San Diego, and was attended by David Rist, David Leland of RWQCB and himself from the TI BCT. The conference reviewed BRAC environmental issues and discussed innovative technologies.

### **13 July 98 RPM/BCT Meeting**

Mr. Sullivan noted that the major topics of discussion at the meeting included: the Navy's program of sampling for lead-based paint in soil; documents in preparation of the summary schedule; Site IR 12; institutional controls; and the no Remedial Action Plan for Sites 1 and 3. Meeting minutes will be out in several weeks.

### **FOSL Status**

Mr. Sullivan stated that the Zone 6 FOSL has been finalized. He noted he is still working on the RAB comments to the Zone 5 FOSL, which is otherwise complete.

## **OTHER BUSINESS:**

### **X. Organizational Business**

#### **Report on the July 11, 1998 Workshop**

Mr. Hansen reported that the City-sponsored planning workshop, held at TI on July 11, was well attended, especially by RAB members. He noted two other stakeholder groups in attendance - members of the TI Museum and members of the Telegraph Hill Neighborhood Association. He recognized Ross Tibbitts, of the Telegraph Hill Neighborhood Association in the audience. Mr. Hansen noted that Pat Nelson and Paul Hehn manned a RAB information table at the workshop. One new membership applicant, Patricia Kite, resulted from the effort. Ms. Kite is interested in participating in the RAB, however she resides in the Hayward/Fremont area and needs transportation to the meetings.

Mr. Hansen asked whether procedure allows that Ms. Kite can automatically be accepted onto the RAB. Mr. Sullivan stated that the procedure for membership selection is up to the community members. The Navy and regulators have no direct influence in the selection process. Mr. Hansen stated that he will call Ms. Kite and invite her to attend the next interim meeting. Mr. Brennan recommended that she be accepted as an applicant. Mr. Hansen agreed, barring no objection from the RAB.

Mr. Van Wye asked for a brief review of the July 11 workshop. Mr. Hehn stated that the City Planning Department presented their overview of the long-term plans for TI. In a breakout group session, participants wrote down their ideas on what should happen to TI and YBI which were then presented to the whole group. Mr. Savage stated that he found interesting the comments made by Annemarie Conroy, Executive Director of the TI Development Authority, regarding the complications and complexity of the planned new Bay Bridge construction and its impact on TI redevelopment.

Mr. Van Wye noted plans for a bicycle and pedestrian path on TI near the bridge, and asked if consideration is being given to the fumes resulting from bridge traffic that might impact the area. Mr. Sullivan responded that the issue regarding bridge operation would be part of the Caltrans environmental process for the bridge. The point at which the bridge contacts YBI would be part of the Navy's and City's EIS/EIR.

## **XI. Proposed Agenda Items**

### **August**

Draft FOST for Site Not Requiring Remedial Action  
Zone 4 FOSL/SSEBS  
Fuel Line Removal Report  
DERTF Report/RAB Caucus

### **September**

Feasibility Study Workshop (as part of regular meeting)

Mr. Sullivan noted that the draft August agenda will be reviewed at the interim meeting. The meeting was adjourned at 9:42 p.m.

*The next RAB meeting will be held on Tuesday, 18 August 1998, at 7:00 p.m., at the Casa de la Vista, NAVSTA TI.*

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TREASURE ISLAND  
SSIC NO. 5090.3

ATTACHMENTS A THROUGH C CAN BE FOUND IN THE:

DRAFT  
RESTORATION ADVISORY BOARD  
MEETING MINUTES

DATED 21 JULY 1998

IS RECORD NO. N60028\_000897

**NAVAL STATION TREASURE ISLAND  
RESTORATION ADVISORY BOARD MEETING MINUTES**

August 18, 1998  
Meeting No. 48

The Naval Station Treasure Island (NAVSTA TI) Restoration Advisory Board (RAB) met on 18 August 1998 at 7:00 p.m. at Casa de la Vista, NAVSTA TI. The goals of the meeting were to: 1) have discussion/approval of the 21 July 1998 minutes, 2) provide time for the City of San Francisco, 3) review the Draft Zone 4 IR Site 12 SSEBS/FOSL Revision 1, 4) discuss the draft Finding of Suitability to Transfer (FOST) Phase Ia and Ib for Sites Not Requiring Remedial Action 5) receive a presentation by RAB community members on comments for the draft Offshore Remedial Investigation (RI) Report, 6) discuss general updates, 7) review action items, 8) attend to organizational business, 9) review the upcoming environmental report review schedule, 10) provide open questions and discussion, and 11) review the proposed agenda items for upcoming RAB meetings and new action items.

These minutes summarize topics discussed during the RAB meeting. A copy of the meeting agenda is provided as Attachment A, the attendance list is provided as Attachment B and the meeting handouts are provided as Attachment C.

**I. Welcome Remarks and Agenda**

James B. Sullivan, BRAC Environmental Coordinator (BEC) and Navy Co-Chair called the meeting to order at 7:12 p.m. He noted this meeting as number 48, marking completion of four years of RAB meetings.

**Discussion/Approval of Agenda**

Mr. Sullivan noted two corrections to the agenda:

- The 7:45 item will address the Environmental Baseline Survey leading to the Finding of Suitability to Transfer (FOST); the draft FOST document will not be issued until comments are received on the EBS, so it will be handled in a two step process.
- A brief presentation on the No Further Action documents for IR Sites 1 and 3 will be added to the agenda; the draft will be out in the next 30 days and will include a public meeting.

**II. Public Comment**

Chris Shirley offered to update the RAB on a San Francisco Board of Supervisors Committee on

Economic Development meeting she attended at which she made a brief statement on behalf of the RAB. She reported that Supervisor Michael Yaki called the hearing as part of the Board's ongoing oversight of the Treasure Island Development Authority (TIDA). One of the updates in the meeting was regarding toxics and how it relates to reuse. Ms. Shirley stated that she pointed out to the committee the areas to be transferred, noting these are considered clean areas. She informed them that the revenue-generating areas are mostly those requiring cleanup, and made the point that cleanup issues are still important to follow. She expressed to both the Supervisors Committee and to TIDA the RAB's interest in staying involved.

Pat Nelson asked about getting on a mailing list for the Economic Development Committee. Mr. Sullivan offered to ask Martha Walters about getting Ms. Nelson on the mailing list. Ms. Shirley added that she was asked to describe any roadblocks to cleanup; she highlighted the TPH screening level issue and suggested the Supervisors get involved to help resolve the situation.

Mr. Sullivan announced that Richard Hansen, Community Co-Chair, would be late to the meeting because he was coming from out of town.

Mr. Sullivan also announced the National Stakeholder's Forum on Monitored Natural Attenuation to be held August 31 - September 1 at the Westin Hotel in Millbrae. Registration materials were mailed out to RAB members; attendance is free, but attendees must register.

There were no members of the general public who wished to make comment.

### **III. Discussion/Approval of the 21 July 1998 Minutes**

Kavitha Rao stated that the second paragraph on page 10 should read "95 percent confidence limit of the mean", and that the third sentence should be removed because it doesn't read correctly. Mr. Sullivan stated that he would check the transcripts to determine what was stated and make the appropriate correction for that sentence. David Rist, DTSC, noted that the second paragraph on page 2 should read monitoring *wells*. There were no other corrections. The July minutes were adopted as amended.

### **IV. City of San Francisco**

Mr. Sullivan introduced Mr. Bob Mahoney, the City's new Facilities Manager for Treasure Island.

### **BRAC CLEANUP PROCESS:**

## **V. Draft Zone 4/IR Site 12 SSEBS/FOSL Revision 1**

Mr. Sullivan noted that a draft Zone 4 FOSL was issued last fall, representing most of the TI housing. Additional field work was also conducted and this data was incorporated into a updated FOSL issued 2 months ago. Based on RAB member comments, the Site Specific Environmental Baseline Survey (SSEBS) was updated to incorporate all of the available data and was reissued with the FOSL in July. The comment period for the SSEBS/FOSL Revision 1 will close on August 21. A presentation on the document was held at the July RAB meeting; tonight's agenda allows for open discussion on the document.

Ms. Nelson noted additional work is still to be conducted at Site 12 and requested a placeholder in the document so the additional data can be included in case hot spots are discovered during the investigation. Richard Knapp, Tetra Tech EMI, stated that some dioxin samples were collected this week, but additional sampling will be delayed by about a week due to problems with the geoprobe equipment.

Ms. Nelson asked if results are expected back in September. Mr. Sullivan indicated that the dioxin sampling is on a critical path because of the lab time involved. He pointed out that the lab work is being expedited, however, and an unvalidated data set is expected by the end of September. Ms. Nelson asked if there were some results that would make its way into the SSEBS/FOSL Revision 1. Mr. Sullivan replied that the objective was to have an unvalidated set of data by the end of September to present to the Regulators, City and RAB to make any decisions before the housing lease went into effect. He estimated that no residents will likely be on site until at least October, which will allow time to review the unvalidated data before occupancy occurs.

Ms. Nelson also asked if any of the TI units had been leased, since there were some that did not seem encumbered. Mr. Sullivan replied that about 250 TI units are included in the completed Zone 3 FOSL, but at present there are no occupied housing units on TI.

Mr. Sullivan noted Ms. Nelson's comment from the interim meeting to discuss the sampling plan in the EBS FOSL.

Ms. Nelson asked about whether the City had reached agreement with the John Stewart Management Company to manage the housing units. Ms. Shirley noted, from discussion at the Supervisors Committee, that she believed an agreement had been reached. Mr. Sullivan stated that the Navy and the City had been working very closely together on the FOSL and leasing schedule.

Lynn Srinivasan, Uribe and Associates, noted that a two week response time will follow the close of the August 21 public comment period. A final SSEBS and draft final FOSL will be issued around September 21. The FOSL will then be finalized about three days later.

Ms. Nelson asked if verbal comments from the meetings will be included in the Navy's responses. Ms. Sirinivasan indicated that they would. Mr. Sullivan stated that the Navy response to comments will be sent out to the Technical Subcommittee about two weeks following the August 21 closure of the comment period.

Ms. Nelson asked if the data from the dioxin sampling will be back in time to incorporate into the final SSEBS/draft final FOSL. Mr. Knapp stated it would be about five to six weeks before the validated data is available. Mr. Sullivan clarified that most of the areas being sampled for dioxin are not included in the leased area, however, some confirmation sampling is being done in the planned lease area. He continued that the original FOSL included all of the housing for Site 12. The Revision 1 FOSL excluded 29 buildings comprised of 174 units; these are the areas undergoing further TPH and dioxin investigation. The Revision 1 FOSL represents the lease footprint; a Revision 2 FOSL will follow which evaluates the 29 buildings excluded from the Revision 1 FOSL.

Ms. Nelson asked if it would be better to have one entire FOSL prepared following the evaluation of the 29 building area rather than several separate FOSL revisions. Mr. Sullivan stated that reissuance of the entire Zone 4 FOSL may be considered.

Mr. Rist noted that the 29 building areas may still need to be excluded in a Revision 2 FOSL if TPH action is required, based on review of the data. Mr. Sullivan stated that when the additional data is reviewed, it will be open to consideration whether reissue of the whole document is warranted. He added that ultimately, a FOST will cover the whole housing property. Mr. Sullivan noted that if actions on TPH areas are being expedited, then closure on Site 12 may be reached much sooner than originally envisioned; the cleanup process for Site 12 may be completed by the end of 1999.

## **VI. Presentation on IR Sites 01 and 03 No Further Action**

Mr. Sullivan explained that documentation is being prepared for No Further Action for IR Sites 01 and 03. The information is currently in pre-draft form, however the draft document will likely be released to the Technical Subcommittee in the next 30 days. A public hearing is planned in the September time frame, although no firm date has yet been set.

Site 01 includes Building 257, the old medical/dental center. Fluid from medical-related equipment had leaked through the floor and into the ground. Site 03, located on the south side of Hangar 3, was used to temporarily store PCB equipment. Both sites have been in the IR program since the beginning and were evaluated during the remedial investigation. The Navy is proposing no further action to formally close out the sites.

Mr. Knapp provided an overview of the process. He noted that the IR Program had begun in the 1980's and that the Draft Final Onshore Remedial Investigation (RI) was issued in 1997. As a result of the RI, IR Sites 01 and 03 were identified for no further action; the remaining 12 onshore sites will be going into the Feasibility Study to look at potential cleanup.

#### **IR Site 01**

Mr. Knapp explained that two soil samples from a 1988 Preliminary Assessment detected silver at IR Site 01; additional sampling determined silver to be isolated to a small area. A small soil removal action was taken; there was no groundwater contamination. The risk assessment for the site assumed future unrestricted residential use. Three pathways for exposure to silver were identified: ingestion, dermal, and inhalation. Silver is non-carcinogenic and the risk was determined to be below the hazard index of 1.

#### **IR Site 03**

Mr. Knapp noted that eight wipe samples were collected from the site in the 1988 Preliminary Assessment/Site Inspection. There were low detections of PCBs in two of the wipe samples. During the Phase I RI, four samples from two borings were collected from both the asphalt material and the soil beneath the asphalt. No PCBs were detected in the soil and therefore there were no groundwater samples collected. Human health and ecological risk assessment was not performed at the site because no PCBs were detected.

Mr. Knapp summarized that no action has been proposed for IR Sites 01 and 03 because:

- the source of contamination in the soil was removed at Site 01 and the risk falls within the EPA's acceptable risk range
- no soil contaminants were detected at Site 03
- there is no groundwater contamination at either site
- there is limited habitat and scarce vegetation
- it allows for more rapid transfer/reuse of the property

Mr. Knapp noted that the next step is to issue a draft Remedial Action Plan (RAP). A fact sheet will be mailed out to announce the 30 day comment period, followed by a public meeting midway through the comment period. A responsiveness summary will address all public comment and accompany the final document as an appendix.

Paul Hehn asked what would be the time frame from the draft RAP to the final decision. Mr. Sullivan responded that a date needs to first be set for the public hearing, which will probably be scheduled for sometime in September. The draft RAP and public notice will be issued two weeks prior to the hearing.

Mr. Knapp noted that ads will be placed in the paper announcing the hearing and the 30 day comment period. Mr. Sullivan stated that this will be the first cleanup document to receive both a RAB Community Member review and a general public review; it will likely be released in early September.

Mr. Hehn asked if the draft RAP will address previous issues brought up in the Phase II investigation as background information. Mr. Sullivan stated that the draft RAP should address any comments regarding Sites 01 and 03. Ms. Nelson asked if the documents would address comments made previously in the draft RI. Mr. Knapp responded that there has not yet been a formal response to the RI comments, including Sites 01 and 03. Mr. Sullivan added that perhaps the comments on Sites 01 and 03 in the RI can be extracted and included in a response to comments document to be released with the draft RAP. Ms. Nelson requested that this information be provided at the next RAB meeting and that it include comments from the regulatory agencies and the City as well as the RAB.

Ms. Shirley suggested that the response to comments document be circulated two weeks prior to the start of the public comment period to allow RAB members time to clarify issues from the RI. Ms. Nelson added that this would be a cleaner approach than to wait until the public comment period. Mr. Sullivan agreed to issue the Navy's response to comments to IR Sites 01 and 03 ahead of time and would work out a schedule for soliciting RAB comments and incorporating them into the draft RAP.

#### **VII. Draft Supplemental Environmental Baseline Survey (SEBS) Phase 1a for Sites Not Requiring Remedial Action**

Mr. Sullivan stated that RAB Technical Subcommittee members have received a copy of the Phase 1a Supplemental Environmental Baseline Survey (SEBS). He explained that for the FOST process, the SSEBS and the FOST documents have been issued jointly; the FOST process will instead be a two step process - the SEBS will be released first, followed by the FOST document. The SEBS has been out for several weeks and the comment period will close on September 18.

Wayne Mayer, Uribe and Associates, provided an overview of the Phase 1a Transfer Area for the draft SEBS. Mr. Mayer explained that the SEBS updates the six SSEBSs prepared in 1997 and 1998, including recent site investigation data and other information on environmental issues. Environmental condition of property (ECP) area types were recommended for parcels covered by the SEBS, based on review of the data.

Mr. Mayer noted that all of the parcels in the Phase 1a transfer area are proposed or confirmed ECP Area Type 1 parcels, with no indication of contamination. The parcels are proposed at this point and, dependent upon regulator comments, may or may not be included in subsequent drafts.

The Phase 1a transfer area is comprised of 48 proposed or previously confirmed ECP area type 1 parcels, all on TI. Six of the parcels are partial transfers, resulting from previous property transfer to the Department of Labor. Mr. Sullivan added that the original parcel boundaries were developed prior to the two federal-to-federal transfers executed in the past six months.

The 48 parcels were divided into two categories - parcels with no indication of past releases and

parcels newly proposed for reclassification as ECP are type 1. Eleven parcels (T001, T026, T032, T033, T063, T064, T082, T083, T085, T088 and T090) were classified as ECP area type 1 in the 1995 Basewide EBS. Seven of these have received regulatory concurrence as ECP area type 1 (T001, T033, T064, T082, T083, T085, and T088). Thirty-seven parcels (T013, T014, T024, T025, T027, T028, T029, T030, T034, T035, T036, T037, T040, T050, T051, T061, T062, T071, T072, T078, T079, T080, T081, T086, T087, T089, T091, T093, T094, T095, T096, T098, T099, T104, T105, T106, and T115) have been proposed for reclassification. The primary concern at 15 parcels (T013, T025, T027, T028, T040, T050, T051, T072, T078, T094, T096, T104, T105, T106, and T115) is that they contain or are adjacent to IR sites or petroleum sites. Data from the RI and CAP indicate that the contaminants have not migrated into the parcels. At six parcels (T024, T034, T035, T036, T037 and T091), the primary concern is potential petroleum fuel lines or above ground storage tanks. Information from the SSEBSs, the EBS Sampling and Analysis Report, and a letter from Laidlaw Environmental Services indicate that there are no outstanding issues on these parcels.

The primary concern at nine parcels (T014, T071, T079, T080, T086, T087, T089, T095, and T099) is the potential for contamination from the storm sewer lines. Data from the EBS sampling and Analysis Report indicated that storm sewer lines are not a concern on TI. At three parcels (T061, T081, and T093) the primary concern is the potential for contamination from the sanitary sewer lines. Data from recent investigation indicates that the sanitary sewer lines are not a concern on TI.

Parcel T029 was historically used as an incinerator. No dioxins or furans were found at this site. Parcel T030 and T062 were originally classified as ECP area type 2 due to historical petroleum product storage. These areas were changed from ECP area type 2 to ECP area type 1 when the DoD redefined ECP area type 1. Parcel T098 was originally classified as ECP area type 7 due to historical chemical storage. This area was changed to ECP area type 1 when DoD redefined the ECP area types to classify storage-only parcels as ECP area type 1.

The SEBS presents the information needed as the basis for the FOST. The Phase 1a transfer area SEBS concludes that the 48 parcels are eligible for transfer. After regulatory approval and community comments, a FOST will be prepared for the parcels that receive regulatory concurrence. The FOST will go through draft, draft final and final stages to allow for community and regulatory input. In addition, an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) will be completed and a National Environmental Policy Act (NEPA) Record of Decision (ROD) will be signed to allow for transfer of the property.

Mr. Mayer reviewed the following schedule:

Phase 1a (TI parcels)

|                             |                    |
|-----------------------------|--------------------|
| Draft SEBS                  | August 12, 1998    |
| Comments due                | September 18, 1998 |
| Draft FOST/draft final SEBS | October 27, 1998   |

Phase 1b (YBI parcels)

|                             |                    |
|-----------------------------|--------------------|
| Draft SEBS                  | September 10, 1998 |
| Comments due                | October 13, 1998   |
| Draft FOST/draft final SEBS | December 3, 1998   |

Ms. Nelson asked when the EIS/EIR and draft ROD is scheduled for release. Mr. Sullivan responded that he is currently reviewing the last internal draft of the EIS/EIR, noting that because it is not part of the cleanup process, he is less familiar with the schedule. He added that it will likely be out before the first of the year.

Mr. Sullivan noted that three requirements must be met in order to transfer the property from the Navy to the City:

- a completed Finding of Suitability to Transfer (Navy's responsibility)
- a signed EIS/ROD (a Federal Government requirement; there is a similar City requirement for an EIR, therefore the Navy and the City will produce a joint EIS/EIR document)
- a real estate conveyance agreement between the Navy and the City

He noted that mid-1999 would be the earliest time for property transfer to occur, given the present schedule of when the three requirements will be met. Mr. Sullivan added that the Navy wanted to proceed with the FOST now so that they would have the process completed prior to the EIS/ROD and real estate agreement. It also provides the chance to work out the FOST process. More time can be taken if needed to complete the FOST, and the parcel map adjusted as necessary.

Mr. Hehn asked if the classification of the parcels takes into account the CERCLA and CAP issues. Mr. Sullivan replied that these sites have no environmental issues. Mr. Mayer added that these sites are category 1, with no previous impacts. Mr. Hehn noted sites on the west side with UST issues and asked about their status. Mr. Sullivan stated these sites included Buildings 1 and 227, and are not included with this proposed transfer area.

Ms. Nelson pointed out that T78, T115 and T272 are close to other sites and questioned why they were not excluded since the plume boundaries from these sites are hypothetical and could impact the other sites. Mr. Mayer stated that adjustments can be made to include or exclude sites based on response received from the regulators and the community. Ms. Srinivasan added that those particular sites were included because contamination from adjacent sites was not expected to travel up gradient, however their proposed inclusion can still be discussed. Ms. Nelson noted the inclusion of site T102. Ms. Srinivasan stated that there has been a lot of discussion about this particular site and the Navy is considering eliminating a portion of T102 from the transfer area but allowing the housing area to remain.

## **VII. Presentation by RAB Community Members on Comments for the Draft Offshore Remedial Investigation Report**

Kavitha Rao, stated that Arc Ecology hosted an open meeting for RAB members in July to discuss the draft offshore Remedial Investigation Report. Patricia Nelson, Nathan Brennan, Christine Shirley and Ms. Rao attended. Ms. Rao reviewed some of the major concerns, as presented in a handout which she distributed.

### **Section 4 - Sampling**

Ms. Rao noted that the document doesn't show where sample attempts were made near IR sites 28 and 29. Also, outfalls which drain IR sites 28, 29 and the Nimitz House Complex lead off of the Coast Guard property. It was questioned why samples were not taken along that coastline.

There is concern as to why more samples were not taken closer to the shore of IR8, by the entrance to Clipper Cove. It is also questioned why more samples were not taken around IR site 15, the fuel farm/Pier 1. These were the three main areas with concerns for sample locations.

### **Section 5 - Screening Methods**

Ms. Rao noted that figure 6-1 of the Paradise Cove reference site is not adequate to show the location and questioned whether this is the area which was once a Naval facility and old coal fueling station at what is now the Baylands Institute. She also pointed out concern with the way the screening methods used the reference site. Five samples were taken in the reference site; the reference site maximum was then used to screen against. It is recommended that the mean or the upper 95% confidence limit of the mean be used for screening, rather than the outlier reference maximum, to obtain the best representation of a clean screening reference.

### **Section 8 - Bioassay Data**

Ms. Rao noted the consistent failures in the bioassay results for Hunters Point, Mare Island and Treasure Island and questioned why the protocol has not been amended. If sediment grain size is affecting amphipod survival, then perhaps another species should be used. It is also questioned why the same lab continues to be used for the sea urchin testing, when most of the data has been rejected due to ammonia toxicity problems. She noted that the lab is in Vermont, however there are reputable labs in the Bay area that could be instead used.

### **Section 9 - HQs**

Ms. Rao noted concern over using effects range mediums (ER-Ms) as an indicator of toxicity. ER-Ms focus on the probabilities of ecological effects, however the offshore RI should instead focus on the possibilities of ecological effects from activities at NAVSTA TI.

### **Section 11 - Conceptual Site Model**

The endpoint risk assessment should also include human consumption of fish. Tissue sampling should include fish data and it should be evaluated to encompass human consumption of fish. PCBs, DDT and mercury levels could then be compared to levels found in other parts of the Bay

to determine if there are Bay-wide trends, or site-specific concerns. Also, the endpoint assessment for benthic feeding birds should be evaluated for diving ducks since they intake a lot more of the sediment, and not just willets.

### **Section 12 - Bioavailability and Exposure Assessment**

Ms. Rao stated that Arc Ecology was not able to provide a thorough review of the eco-risk assessment because the eco-risk assessment hinges upon threshold reference values (TRVs). The TRVs come from a draft Biological Technical Advisory Group (BTAG) document, which was only recently received. Additional comments on Section 12 will follow.

Pat Nelson noted that the BTAG document was published in May 1997. She requested as an action item that copies be provided to the RAB as an action item. Mr. Sullivan agreed to provide copies to the Technical Subcommittee, as well as others interested.

Mr. Hehn commented that DTSC had also recently provided comments to the Navy on the ammonia toxicity and fine grained sediments issues regarding bioassay methods.

Mr. Sullivan recognized Penny McDaniel from US EPA Region IX, sitting in for James Ricks.

### **VIII. Defense Environmental Response Task Force (DERTF) and RAB Cancus Brief**

Ms. Shirley explained that DERTF is a seven to nine member advisory group that advises the Department of Defense (DoD) on military base cleanup. They meet twice per year; this past June they met in Chicago and will be meeting in San Francisco in February 1999.

The June meeting had several dominant themes:

- Cleanup obligations beyond remedies in place (the DERTF is to come up with a new accounting system that will allow for long term monitoring and maintenance cost)
- Institutional controls (a dominant discussion point - refer to summary handout in Attachment C)
- BRAC records control (how to maintain large collections of documents associated with cleanup decisions - DoD agreed to look into providing the information on microfilm in the local communities)
- Lead issue (refer to draft EPA document in Attachment C)

Ms. Shirley stated that she has three copies of the DERTF conference materials to loan to interested RAB members. She also noted the DoD RAB member web site, that will include a chat room feature, and added that it is a monitored site. The address is: There is also a BCT web site at

Ms. Shirley also noted that the DoD's *Management Guidance for the Defense Environmental*

*Restoration Program*, is available on the Internet. It contains the rules that must be followed under the DoD's environmental cleanup program. She noted it is useful in helping to understand the reasoning behind some decisions. The web site address is:  
<http://denix.cecer.army.mil/denix/public/ES-Programs/cleanup/DERP/guide.html>.

Ms. Shirley next discussed the RAB Caucus, a fledgling national organization coordinated by Arc Ecology. Membership is composed of community RAB members who come together to discuss concerns, issues, solutions and strategies. She provided copies of the last meeting minutes to TI community RAB members. The next meeting will be October 17-21 in Washington, D.C. and will include discussions with Congressional representatives, U.S. EPA and other organizations. Some travel scholarships will be available. Ms. Shirley distributed copies of a questionnaire to help determine meeting content.

Ms. Shirley noted the effectiveness of the RAB Caucus. She explained that, through the support of the Caucus, a RAB in Texas with a primarily Spanish-speaking community recently was provided with Spanish-translated cleanup documents. She stated that a RAB Caucus meeting will be held at the same time as the DERTF meeting this February in San Francisco.

Mr. Hehn voiced his appreciation for receiving the minutes and agenda via email. Mr. Sullivan asked that members update their email addresses.

Ms. Shirley asked about information she had heard regarding a DoD web site set up for each RAB. Stacey Lupton, TtEMI, noted that the Office of Economic Adjustment had set up a web site for national BRAC sites and there was interest in extending the site to RABs, however they don't have the capacity. Mr. Sullivan stated he hopes to move towards electronic distribution of information in the near future.

#### **IX. Overview of the FY98 Projects, Documents and Funding and Preparation for FY99**

Mr. Sullivan provided a brief overview of the status of FY98. He noted that TI is expected to have received \$8 million in funding for this year, which is more than has been spent in previous years. Funding will increase to \$9-10 million for FY99. Projects funded have included asbestos abatement, to be completed FY99; preparatory work for lead-based paint abatement, with contract work to be performed in FY99; Corrective Action Plans for both the major IR sites as well as small sites and fuel lines (the petroleum sites work is currently slowed until resolution is reached on TPH screening levels); and the Remedial Action Plan/ Record of Decision will be awarded for the onshore CERCIA sites, and the feasibility study will continue for the offshore CERCIA sites. Mr. Sullivan summarized that most of the investigation work has been funded in 1998, and that work will move into the remediation stage in 1999. Major CERCLA site remediation will occur in 2000-2001.

## **PROGRAM UPDATES:**

### **X. General Updates**

#### **Announcements**

Mr. Sullivan again noted the National Stakeholder's Forum on Monitored Natural Attenuation to be held August 31 in Millbrae.

#### **3 August 98 RPM/BCT Meeting**

Mr. Sullivan reviewed the following topics discussed at the meeting:

- TPH screening levels (this is a regional issue being discussed by higher level management)
- Tank 180C, currently in the petroleum program but has non-petroleum constituents to be addressed
- Zone 4 FOSL
- EPA Region IX letter on groundwater directed at Hunters Point issues that may have an impact on other bases.
- risk assessment as relating to reuse and transfer (Mr. Sullivan recently met with Martha Walters and David Rist; they translated the reuse plan into risk assessment language and looked at how to implement the risk assessment to support the reuse plan)
- Davis Rist briefed the BCT on DTSC's lead based paint sampling in non-residential structures - lab data from DTSC's own lab analysis will be available soon and will be shared at the next meeting
- Institutional controls

The meeting minutes will be mailed out in about three weeks. The next BCT/RPM meeting is scheduled for August 31 at the TetraTech offices.

### **XI. Review of Action Items**

Mr. Sullivan stated that a contract will be awarded to TetraTech by the end of September for data management.

Mr. Hehn noted that the ability to look at data on a Geographic Information System (GIS) would be extremely helpful in reviewing the EBS, FOST and FOSL documents.

## **OTHER BUSINESS:**

### **XII. Organizational Business**

Mr. Sullivan stated that an on-going membership drive has resulted in one applicant. He expressed hope that the upcoming draft EIS and the public meeting for Sites 01 and 03 may provide additional recruitment opportunities.

Mr. Sullivan noted that it doesn't look likely that a TAPP proposal will be prepared for FY98. Ms. Shirley stated that the DERTF is very interested in institutional controls and expressed that findings of a TAPP-funded project on this topic would likely be well received at the February 1998 DERTF meeting. Ms. Nelson stated the need to get a proposal together on the topic. Ms. Shirley added that she also learned that institutional controls is a topic of interest from a recent discussion with the National TAPP Administrator.

### **XIII. Proposed Agenda Items**

#### **September**

- Feasibility Study Workshop
- Fuel Line Removal Report and Other USTs
- FY99 Cleanup Program
- Draft Phase Ib SEBS

#### **October**

- Draft Phase Ia FOST

### **XIV. Closing Remarks/End of Meeting**

The next RAB meeting will be held Tuesday, September 15; the next interim meeting is scheduled for Wednesday, September 2 at the Arc Ecology offices. The BCT meeting will be held on August 31 at the TetraTech offices and the next Treasure Island Development Authority meeting will be on Wednesday, August 19 at the Ferry Building.

Ms. Shirley noted that formation of an advisory committee to TIDA is being discussed. She recommended that the RAB consider placing a representative on the committee. She also requested that a letter be sent to TIDA's executive director, Annmarie Conroy, asking that the RAB be placed regularly on the agenda.

Mr. Hehn asked when the Onshore Remedial Investigation Phase IIb report would be finalized. Mr. Sullivan responded that the report hinges on resolution of the screening levels issue. He added that there is no date yet, but the parties are closer to resolution. He noted that the issue has been brought to the forefront because many of the documents depend on the TPH screening method. Ms. Nelson requested an update on the issue at the September or October meeting. Mr. Sullivan offered that the BCT would address this as an agenda item at their next meeting and report back to the RAB at the September RAB meeting.

*Mr. Sullivan adjourned the meeting at 9:55 p.m.*

**ACTION ITEMS**  
**8/19/98**

1. Provide the RAB Technical Subcommittee with copies of the May 1997 BTAG document.
2. Provide update on the TPH screening level issue at the September RAB meeting.
3. Provide a response to comments for IR Site 01 and 03 to solicit input for the preparation of the Draft No Action RAP.

ATTACHMENT A – MEETING AGENDA  
ATTACHMENT B – ATTENDANCE LIST  
ATTACHMENT C – MEETING HANDOUTS

THESE ATTACHMENTS ARE NOT AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY NAVFAC  
SOUTHWEST RECORDS OFFICE TO LOCATE THE MISSING  
ATTACHMENTS. THIS PAGE HAS BEEN INSERTED AS A  
PLACEHOLDER AND WILL BE REPLACED SHOULD THE  
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FOR ADDITIONAL INFORMATION, CONTACT:

DIANE C. SILVA, COMMAND RECORDS MANAGER, CODE EV33  
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**NAVAL STATION TREASURE ISLAND  
RESTORATION ADVISORY BOARD MEETING MINUTES**

**September 15, 1998  
Meeting No. 49**

The Naval Station Treasure Island (NAVSTA TI) Restoration Advisory Board (RAB) met on 15 September 1998 at 7:00 p.m. at Casa de la Vista, NAVSTA TI. The goals of the meeting were to: 1) have discussion/approval of the 18 August 1998 minutes, 2) provide time for the City of San Francisco, 3) review the TAPP Proposal on Institutional Controls, 4) discuss the draft Finding of Suitability to Transfer (FOST) Phase Ia for Sites Not Requiring Remedial Action, 5) receive a presentation on the draft Finding of Suitability to Transfer (FOST) Phase 1b for Sites Not Requiring Remedial Action (Yerba Buena Island), 6) discuss updates on Lead in Soil Sampling and Abatement, 7) review action items, 8) attend to organizational business, 9) review the upcoming environmental report review schedule, 10) provide open questions and discussion, and 11) review the proposed agenda items for upcoming RAB meetings and new action items.

These minutes summarize topics discussed during the RAB meeting. A copy of the meeting agenda is provided as Attachment A, the attendance list is provided as Attachment B and the meeting handouts are provided as Attachment C.

**I. Welcome Remarks and Agenda**

James B. Sullivan, BRAC Environmental Coordinator (BEC) and Navy Co-Chair called the meeting to order at 7:11 p.m. Mr. Sullivan noted that he has been E-mailing the agenda and minutes to RAB members prior to the meeting and requested that RAB members include or confirm their E-mail addresses on the sign-in list.

**Discussion/Approval of Agenda**

There were no comments regarding the agenda.

**II. Public Comment**

There were no members of the public present.

**III. Discussion/Approval of the 18 August 1998 Minutes**

Richard Hansen noted a correction to the heading date of the minutes which should read August 18 rather than August 19. The minutes were approved with this correction.

#### **IV. City of San Francisco**

There was no report from the City of San Francisco.

#### **BRAC CLEANUP PROCESS:**

#### **V. TAPP Proposal on Institutional Controls**

Kavitha Rao, Arc Ecology, distributed copies of a proposed TAPP project on the effectiveness of institutional controls on Treasure Island.

The proposal is split into two major issues regarding institutional controls. The first looks at existing local and national institutions and laws that could enforce and oversee the institutional controls. This would entail researching the success rate of institutional controls put into place at other areas, and looking at California property laws and San Francisco land use regulations. There would also be an analysis of the cost associated with institutional controls including costs subsequent to the transfer of the property to the City. The second part of the project would involve looking at the site-specific geological considerations of the island, and whether seismic stabilization and the tides would affect any contaminants left in place.

Two key people would work together on the project: Ross Tibbitts, an environmental policy and management graduate student who will be doing the local research; and John Pendergrass, from the Environmental Law Institute, who has written most of the published legal documents on institutional controls found in the library or on the Web. Mr. Pendergrass is based in Seattle, but would oversee Mr. Tibbitts work on the project.

Mr. Sullivan noted that a TAPP proposal requires a majority vote by RAB members, and if approved, will be forwarded on to the Navy.

Ms. Rao noted that Chris Shirley met with the National TAPP Program Administrator, at the recent national Defense Environmental Response Task Force (DERTF) meeting, who expressed interest in using TAPP funds to establish TI as a case example regarding institutional controls. Ms. Rao added that she feels they have a good shot at receiving funding. A handout outlining the proposal was distributed.

Mr. Sullivan opened the floor to comments on the proposal. He noted that there had been a favorable response to the proposal at the interim meeting.

Mr. Hansen asked if the RAB has to provide any financial estimates to accompany the proposal.. Mr. Sullivan stated that the RAB has an option to select a representative to actively participate with the Navy contracting staff in awarding the contract, or they can leave the process up to the Navy contracting office. Ms. Rao asked if the representative would work with the contractors proposed by the RAB or would work with a contractor selected by the Navy. Mr. Sullivan stated

that the cost of the project would determine if alternative providers would be sought. There is more latitude if the costs are below \$2,500; if over \$2500. there may be a need to seek other cost proposals. The funding doesn't go directly to the individual or organization, but rather the individual or organization receives an official federal government contract to produce a work product. They are then paid based on the submission of that work product.

Ms. Rao clarified that Mr. Tibbetts and Mr. Pendergrass would be the providers who would be paid from the TAPP funds, not Arc Ecology. Ms. Rao agreed to serve as the RAB's representative to work with the Navy in the contracting process.

Mr. Hansen suggested acceptance of the TAPP proposal. Mr. Brennan noted that a workshop on institutional controls is planned to follow the one recently held on natural attenuation. He added that the two are closely tied and that it would be a timely research project.

Mr. Sullivan reminded RAB members that only community members can participate in the vote. Mr. Brennan motioned for approval of the proposal; James Aldrich seconded the motion. Seven RAB members were present and all voted in favor of submitting the TAPP proposal on addressing institutional controls.

Mr. Sullivan agreed to submit a copy of the proposal to the Navy contracting office for their evaluation. He added that this will be a FY99 project since the Navy is approaching the end of the current fiscal year. FY 99 funds will be received sometime after October 1, but there is no exact date yet as to when funding will be available for contract awards.

#### **VI. Discussion of Draft Site Environmental Baseline Survey (SEBS) Phase 1a for Sites Not Requiring Remedial Action**

Mr. Sullivan noted a correction to the agenda; it should read "Discussion of Draft SEBS..." rather than "Draft FOST" for both the 7:30 and 7:50 agenda items.

Mr. Sullivan reviewed that previously, for the leasing process, a combined draft FOSL and SEBS was issued. The transfer process will instead follow two steps. The SEBS will be issued first, then when finalized, a draft FOST will be developed. The draft SEBS for Phase Ia, which covers those sites on TI not requiring remedial action, was issued last month. The deadline for comments is this Friday, 18 September. The Phase Ib SEBS, for sites not requiring remedial action on YBI, will be mailed out to RAB members tomorrow. The comment period for the Phase Ib document will end on Friday, 23 October.

Mr. Sullivan opened the floor to comments and questions on the Phase Ia document; the verbal input at this meeting will be captured in the transcript. Comments will also be accepted in writing, verbally, by E-mail or fax.

Mr. Hansen expressed concern over disclosure issues covering asbestos, specifically regarding

underground steam and condensate lines. He pointed out that page 4.8 of the draft report states that results of the survey are scheduled to be available September 1998. Mr. Sullivan indicated that the surveys have been conducted on the steam system, however the report is not yet available. He added that there will be time to incorporate the information into the FOST prior to issuance of the final document.

Mr. Hansen inquired about the old boiler plant demolished in the 1940's, that may have contained asbestos, and questioned whether the Navy would dig up the site and dispose of asbestos that may be buried in the soil. He also asked if it would be the Navy's responsibility to dig up the steam and condensate lines which contain asbestos. Mr. Sullivan stated that these are two separate issues. If there was asbestos that had been disposed of into the soil, it would be considered a CERCLA release and would be covered under the installation restoration program. He noted that there is one site at the old boiler plant, where, during the initial assessment in 1988, there was some indication that debris from the plant had been buried. As a result it was established as an IR site. In the Phase I remedial investigation, no asbestos was identified, although other substances were found. If asbestos had been found in the ground, however, that would have been cause for its removal.

Mr. Savage asked about the methodology used for locating asbestos. Mr. Sullivan replied that there would be an excavation, samples would be taken within the excavation, then a lab would analyze the samples for asbestos fibers.

Regarding the steam system noted by Mr. Hansen, Mr. Sullivan reviewed that an investigation of the line was performed, particularly where the line comes up out of the ground and enters into the building. Damaged portions were repaired or removed. The portion that remains in the ground would be disclosed to a future operator of the property. A known pipeline is reported as a disclosure; it differs from a site where asbestos debris might have been buried in a less precise location, and so would require a CERCLA investigation.

Mr. Hansen commented that disclosure of a pipeline in the ground is a good example of an institutional control. He added that unless it is controlled rigidly, people are likely to forget about it.

Mr. Sullivan noted that DoD's policy for asbestos abatement is to abate where asbestos is friable, meaning damaged and accessible. Damaged asbestos can remain inaccessible if controls such as physical barriers and signage are placed on the access to the area.

Mr. Savage asked whether this would be considered an institutional control. Mr. Sullivan responded that the term institutional control refers more to releases that have occurred into the soil or ground water. Mr. Rist added that an institutional control acts as a remedy to prevent contact with a contaminant left in place rather than having been removed. The steam lines wrapped with asbestos do not constitute a release, and so do not warrant an institutional control. An institutional control is a remedy as part of the CERCLA process that is identified in the FS.

Mr. Hansen asked if the asbestos sampling results would be included as a supplement to the report. Mr. Sullivan stated that the results would not be incorporated into the FOST but would be noted as a disclosure in the real estate documents for deed transfer.

Ms. Srinivasan, Uribe & Associates, commented that the information would be summarized in the EBS. While it won't include the actual asbestos data, it will note which buildings were investigated and abated, and contain a reference for the survey report where all of the data can be found.

Mr. Hansen pointed out that transite pipe (asbestos cement pipe) may have also been used for water pipe, and should be dealt with. Mr. Sullivan stated that transite pipe would also be handled as a disclosure.

#### **VII. Presentation on Draft Finding of Suitability to Transfer (FOST) Phase 1b for Sites Not Requiring Remedial Action (Yerba Buena Island)**

Mr. Sullivan stated that the Phase 1b document would be mailed out to RAB technical committee members tomorrow; other interested RAB members can also request a copy.

Wayne Mayer, Uribe and Associates, noted that the Phase 1b presentation would be similar to the Phase 1a presentation given last month. Mr. Mayer stated that the primary purpose of the supplemental environmental baseline survey (SEBS) is to update two site-specific EBSs prepared in 1997 and 1998 for YBI. The update includes recent site investigation data and other information on environmental issues. Based on review of the data, environmental condition of property (ECP) area types are recommended for each parcel in the transfer area.

Mr. Wayer explained that ECP area type 1 is defined as parcels where no release or disposal (including migration) has occurred. ECP area type 3 is defined as parcels where a release has occurred at levels that do not require action. The YBI Phase 1b transfer area comprises 12 ECP area type 1 parcels and 1 ECP area type 3 parcels.

The 13 parcels were divided into two categories:

- parcels with no indication of past releases
- parcels proposed for reclassification as ECP area type 1 or 3

Four parcels were classified as ECP area type 1 (YB005, YB007, YB012, and YB022); YB012 received DTSC concurrence as ECP area type 1. Nine parcels have been proposed for reclassification (YB003, YB004, YB006, YB009, YB016, YB013, YB014, and YB023).

The primary concern at three parcels (YB004, YB016, and YB23) proposed for reclassification was potential contaminant migration from installation restoration or petroleum sites. Data from the RI and the CAP indicate that the contaminants have not migrated onto these parcels. The

primary concern at two of the parcels (YB013 and YB014) was potential contamination from underground or above ground storage tanks. Information from the SSEBSs and a letter from the RQOCB indicate that there are no outstanding issues on these parcels. Parcel YB003 was historically used as a pistol firing range, so there was some indication of contamination. Lead was determined to be present on the site, from the EBS Sampling and Analysis Report, but at below action levels. The final three parcels (YB006, YB009 and YB015) were originally classified as ECP area type 2, due to historical petroleum product storage. These parcels were changed from ECP area type 2 to area type 1 when the DoD redefined area types to classify storage-only parcels as ECP area type 1.

Mr. Mayer stated that the next step will be to prepare a FOST. The FOST presents the rationale as to how and why the sites are eligible for transfer and is based on information contained in the SSEBS. He noted that input from the community and from the regulatory agencies will be considered before a final decision is made about which parcels to transfer. He added that the property still cannot be transferred until the environmental impact statement and environmental impact report are prepared and submitted and approved, and a National Environmental Policy Act record of decision is completed for the parcels.

Mr. Mayer reviewed the schedule for the Phase Ia and Phase Ib documents. Comments on the Phase Ia report are due at the end of this week (September 18). A response to comments will follow and then a draft FOST will be prepared for release on about October 27. The Phase Ib report will be sent out tomorrow, with comments due October 23. The draft FOST will be prepared about December 3.

Mike Michelsen asked about the process of the EIR. Mr. Sullivan responded that the EIS/EIR is separate from the cleanup program, and the cleanup team is not directly involved with the production of the documents. The Navy and the City will issue the EIS/EIR as a joint document. The Navy is required to develop an EIS because the property is being transferred; the city is required to produce an EIR to assess the impact of proposed development as a result of implementing the reuse plan. One section on hazardous materials incorporates the cleanup program. The EIS/EIR is expected to be released by the end of the calendar year. The Navy and the City are currently reviewing the draft document which will then be issued to the community and regulatory agencies. A public meeting will follow.

Mr. Hansen asked if the EIS/EIR will have been presented, discussed and approved before all of the FOSTs are completed. Mr. Sullivan affirmed this, assuming that the EIS/EIR is released by the end of the year and is approved. Some of the early FOSTs will be completed by the time the ROD is issued sometime in 1999. FOSTs for sites that require cleanup action, however, would not likely be issued until after the EIS/EIR.

Mr. Hansen stated his hope that the asbestos issues, which apply for Phase Ib as well as Phase Ia, would be addressed. Mr. Sullivan indicated that Mr. Hansen's comments made for Phase Ia can be applied to Phase Ib and can be addressed in the Navy's response to comments for both documents.

Mr. Sullivan reiterated that the Navy is not trying to rush through the FOSL process. He noted that these first FOSLs give the Navy an opportunity to work through the process; the Phase I sites do not require remedial action, and provide an opportunity to work with community members and regulators ahead of more challenging FOSL documents to come. He noted that he will allow more review time for both the SEBS and the FOST, if necessary.

### **VIII. Update on Lead in Soil Sampling and Abatement**

Mr. Sullivan noted that this update was in response to comments during the last meeting regarding the status of lead in soil issues. He explained that Navy and DoD guidance follows Housing and Urban Development Title X, which calls for sampling for lead in soil in residential areas constructed before 1978. The quantity of lead in paint was severely limited after 1978. The quantity of lead in paint was initially reduced in 1960. Mr. Sullivan stated that the Navy is providing a disclosure of the sampling results to both the leasees and the transferees for residences constructed between 1960 and 1978.

For residences constructed prior to 1960, the quantity of lead in paint was higher. HUD guidance is to abate those hazards prior to the transfer of property. For leasing the property, the leasee would be required to perform interim controls. The Navy would still be required to do abatement, however, prior to the transfer of the housing. Mr. Sullivan pointed out that, by agreement with the city, the Navy is mostly undertaking complete abatement, prior to the long-term leasing of the property. The older, pre-1960 is not being leased out to allow the Navy to complete the abatement. Then the Navy can transfer it to the City when all the documentation is ready.

Mr. Sullivan stated that the Navy would sample for lead where a CERCLA release may have occurred, for non-residential property. He noted sites 12 and 9 as examples of sites being further investigated for lead released into the soil. He noted that the Navy doesn't consider normal painting and natural weathering of the paint to be a CERCLA release, pointing out that there is some difference of opinion on this between the Navy and the State.

Mr. Sullivan stated that the Navy has undertaken the lead sampling in residential areas. A number of samples have been collected at Site 12 under both the residential lead paint program and the CERCLA program. Lead in soil is a contaminant of concern at several IR sites. There is some discussion of sampling protocols being used by the Navy.

Mr. Sullivan called on David Rist, DTSC, to continue discussion regarding the state's viewpoint on lead in soil around residential and nonresidential structures. Mr. Rist explained that it is DTSC's stance that lead in soil should be addressed under CERCLA regardless of whether it came from a building or not, because it is considered a CERCLA release. The regulatory agencies entered into agreement with the Navy allowing DTSC to evaluate lead around nonresidential structures to determine if they need to be further addressed.

Mr. Rist distributed a handout summarizing sampling results conducted on 04 August around a

representative number of buildings on TI and YBI constructed prior to 1978. Sampling eight buildings of TI and two buildings on YBI. Mr. Rist noted DTSC's position that lead levels on TI around nonresidential structures are not high enough to warrant further action. The levels are considered to be within the range of a screening level that are acceptable and that would lead to the conclusion that these parcels require no further action under the City's current reuse scenario. Mr. Rist noted higher concentration numbers for several samples taken on YBI, but no conclusions have yet been drawn and there have been no discussions yet with the Navy.

Mr. Hansen asked what concentrations are considered action level, and what is acceptable. Mr. Rist replied that concentrations above 130 ppm are being evaluated for nonresidential areas, however new information about lead has raised the acceptable level up to about 400 ppm. It is consistent with the number derived by EPA sometime ago. He added that DTSC management and the EPA are comfortable with the numbers for Treasure Island; no further actions are needed. Mr. Rist also noted that some of the buildings may be demolished, and that reconstruction would move the soil around and thus mix and dilute the lead. Although he did not want to imply that DTSC is comfortable with the notion that dilution is okay, it is likely to happen.

Mr. Hansen asked what level does the City of San Francisco consider to be an action level. Mr. Rist responded that the City has been apprised of the information and is comfortable with the numbers. Mr. Hansen asked what HUD's opinion is. Mr. Rist responded that DTSC addresses lead in soil from a CERCLA standpoint, running the data through a risk assessment. The levels are reduced significantly when an exposure average is taken. Also, the levels are a lot lower than at other sites like the Presidio or Mare Island that have older structures.

Mr. Rist noted that DTSC has commented in the FOST that these sites should be treated as ECP area type 3's. Any parcel on TI that has a structure on it without any other issues can be classified as area type 3, and therefore, found suitable for transfer.

Mr. Savage asked why lead levels on YBI are so much higher. Mr. Rist replied that he suspects it is due to the age of the structures and the degree of weathering they have received. Mr. Sullivan pointed out that YBI structures are about 50 years older than those on TI.

Ms. Rao requested an update on the status of the residential lead sampling on YBI. Mr. Sullivan explained that an initial round of sampling was conducted under a program prior to base closure for lead at all Navy housing. A more in-depth sampling will be conducted in the pre-1960 housing areas on YBI to determine whether or not to abate. Ms. Rao noted discrepancy over sampling protocol during discussions at the last BCT meeting and asked if agreement had been reached. Mr. Sullivan indicated that no agreement has been reached but that the BRAC Cleanup Team plans to meet around the first week in October to discuss the issue. Ms. Rao requested a copy of the lead in soil sampling work plan. Mr. Sullivan stated that a copy could be provided to Ms. Rao, noting that the draft will await outcome of the BCT meeting on sampling protocol.

Ms. Rao distributed a handout on regarding concern over EPA's plans to finalize a national standard on lead levels under the Toxic Substances Control Act (TSCA). Currently California

EPA recommends 130 ppm for lead and National EPA recommends 400 ppm. EPA's proposed national standard would be raised to 2,000 ppm, and is based on a cost-benefit analysis, not on a risk assessment. Ms. Rao stressed that the standard has extreme implications. Arc Ecology is publicizing the concern and is requesting a 60-day postponement of the deadline for comment, now set for 01 October. She requested RAB members to press for the deadline postponement. Ms. Rao added that Arc Ecology would like to be kept up-to-date on the YBI sampling because it was initially proposed to follow the TSCA 403 document.

Mr. Hansen asked what kind of abatement technique would be used by the Navy if, hypothetically, lead levels were found much higher than sampling data indicates. Mr. Sullivan stated that there are not many abatement alternatives for lead in soil other than to dig it up and remove it. Lead in soil that has been shed from a structure typically remains fairly shallow within the soil, so surface excavation will dramatically decrease the level of lead in soil.

Mr. Hansen followed up by asking whether the Navy would initiate an institutional control if the lead levels were not quite as high. Mr. Sullivan replied that there is a distinction between abatement and interim controls; the abatement permanently removes the hazard. HUD publishes guidelines for lead paint in residential housing, and interim controls could entail institutional control in terms of preventing access to an area, but would not be considered abatement. In order for federally-owned housing to be deed transferred, the Navy must undertake an abatement rather than just a control. If the Navy were to continue to operate the housing then protection might be adequately provided by controlling it, but because the property is to be deed transferred, the Navy is required by law to perform permanent abatement. This holds true for all federally-owned housing, including military housing.

Mr. Hansen asked what is an acceptable level of lead concentration for active Naval bases used for military housing. Mr. Sullivan reiterated that 400 ppm would be the Navy's policy, which would be achieved either by permanently removing it or by providing a control, such as grass cover. Mr. Hansen voiced similar comments he made earlier for the Phase Ia and Phase Ib reports, requesting greater discussion of the sampling results once they are available. Lynne Srinivasan, Uribe and Associates, affirmed that this was planned.

Mr. Sullivan noted that the Navy is in the process of contracting for the abatement of the interior and exterior paint on the housing constructed before 1960. The structures will likely be abated first, followed by abatement of the soils.

## **PROGRAM UPDATES:**

### **IX. General Updates**

#### **TPH Update**

Mr. Hansen called on Richard Knapp, TetraTech EMI, to provide an update on TPH screening levels for groundwater and soil. Mr. Knapp reported that the regional board (RWQCB) has made recommendations for TPH screening levels. The Navy has also arrived at screening level

numbers through their own testing. Mr. Knapp indicated that he was unsure whether progress has been made in reaching an agreement on TPH screening levels between the Navy and the regional board.

Mr. Knapp added that additional groundwater and soil samples were collected recently at Site 12 to obtain more information on TPH at that site. This additional information may come into play in reaching agreement on screening levels.

### **31 August 98 RPM/BCT Meeting**

Mr. Knapp also reported on the BCT meeting held in San Francisco on 31 August. He noted that EPA's criteria for groundwater was a topic of discussion. He explained that EPA has issued a letter to the Navy in general indicating their criteria for groundwater is at 10,000 total dissolved solids (TDS); the RWQCB criteria is 3,000 TDS. The BCT believes that the criteria will have little effect on TI because groundwater will not be a drinking water source and therefore is not a completed human health pathway.

Discussion also focused on lead in soil in one particular area of Site 12. DTSC is questioning whether there is adequate characterization of this area because of elevated concentrations found there. Discussions are continuing. Mr. Knapp also noted that TPH screening levels, lead-based paints, DTSC's lead sampling results, and the RAB meeting agenda were also discussed.

### **31 August Monitored Natural Attenuation Seminar**

Nathan Brennan reviewed the seminar, hosted by the Center for Public Environmental Oversight (CPEO), formerly Career Pro, associated with San Francisco State University. It was funded by the Air Force, the Navy, the EPA and the Department of Energy (DOE).

Mr. Brennan explained that EPA is currently developing a definition for natural attenuation. The seminar addressed what is natural attenuation, whether it can be considered as a cleanup method and what kind of requirements would be involved. One main concern is how to be sure natural attenuation is accomplishing cleanup, and how to gather proof that the material is being converted.

Mr. Brennan noted that 65 of the 200 or so attendees were from RABs and Citizens Advisory Boards (CABs). Some panels during the meeting allowed for discussion of the issues by the participants. He added that the DOE is dealing on a much larger scale with this issue, such as in the Tennessee Valley Authority. Mr. Brennan pointed out that the key is to closely monitor the natural attenuation process as will be required in the EPA rule. He added that the seminar was for stakeholders, who are essentially all of the public.

### **FY98 Cleanup Program Completion and FY99 Cleanup Program Planning**

Mr. Sullivan first discussed the FY98 program, noting that projects are divided into two areas, compliance and installation restoration. A handout summarizing the FY98 Cleanup Program was distributed. This year has been about an \$8 million program, although the year is not quite complete. Mr. Sullivan pointed out that, since work is funded over multiple years, the cost in any one year is not the total cost of the project.

Mr. Sullivan reviewed that the following compliance projects were funded in FY98, for a sum total of \$4.5 million:

- SSEBs and FOSLs for Zones 4, 5 and 6 and some miscellaneous work
- SEBS and FOSTs to include the Phase Ia and Phase Ib documents
- Lead paint surveys, and the design and abatement work for the structures; soil abatement will be funded in 1999
- Asbestos abatement
- Fuel line remedial investigation, based on the fuel line removal report
- Smaller UST investigations and groundwater monitoring, including integrated quarterly monitoring for both the miscellaneous USTs and the large Corrective Action Plan (CAP) sites
- A small project to deactivate refrigerants and fire protection systems as part of the Clean Air Act

Mr. Sullivan then reviewed the installation restoration projects funded for FY98, which total nearly \$3.5 million:

- Final Corrective Action Plan, sending resolution of the TPH screening level issues; the draft CAP has already been issued.
- CAP site design
- Offshore Remedial Investigation Report
- Offshore Feasibility Study, dependent upon finalization of the RI document
- ComRel support, to include support for RAB meetings and the information repositories
- Interim groundwater monitoring on the IR sites
- Final Onshore Remedial Investigation Report and Feasibility Study
- Additional sampling at Site 12
- No further Remedial Action Plan for Sites 1 and 3
- General Technical Support

- Environmental Data Management, to be awarded

Mr. Sullivan noted that the Navy has until 30 September to award remaining work, otherwise work cannot be funded until receipt of the FY99 funds.

Mr. Hansen asked what has been the total cost over the past four years. Mr. Sullivan stated that he thought the total was between \$12-15 million. The FY98 program has been by far the largest program for TI. Mr. Hansen asked what the final total will be once all the cleanup is complete. Mr. Sullivan responded that the figure could be anywhere from \$60 to 80 million by the end of the cleanup. About \$9 million is programmed for FY99. The major funding years for remedial action will be in FY2000 and FY2001, and run about \$20 million each.

Mr. Sullivan explained that FY98 funds have been mostly devoted to getting through the investigation costs and FY99 funds will focus on completing the feasibility studies, the design work and non-IR site cleanups. The bulk of the IR sites, the fuel lines and miscellaneous smaller UST cleanups are planned for 2000 and 2001. The last of the cleanup work would be funded in 2001 although construction work will likely continue into 2002. The Navy is projecting that the final FOST for the last piece of property would be issued in 2002. The first property transfers could occur, however, with the Phase I sites, once a real estate agreement is reached between the Navy and the City.

Mr. Hansen commented that the cost of cleanup translates to about \$50,000 per acre for TI. Mr. Sullivan responded that the cost isn't that different from what is spent on private sites.

Mr. Sullivan stated that community members' comments will be solicited as to the relative ranking of projects for FY99. He added that this year, everything was funded that was needed. If additional money is found before 30 September, it will go to fund the records of decision for the IR sites. The funding received this year has been sufficient to keep the cleanup on schedule. It will be critical to resolve the TPH screening and cleanup levels for the coming year in order to remain on schedule.

#### **X. Review of Action Items**

Mr. Sullivan reviewed the status of action items from the previous meeting. He noted the following three items:

- Arc Ecology has been provided with a copy of the May 1997 BTAG document; additional copies will be mailed to members of the technical subcommittee. Mr. Brennan expressed interest in also reviewing the document.
- Richard Knapp provided an update on the TPH screening level issue earlier in the meeting.

Mr. Sullivan added that the issue is still on-going, however the Navy and regulatory agencies are working towards developing a common methodology that can be used on the sites. Because petroleum is not a CERCLA substance, it falls to the individual states, which differ in their cleanup standards. The issue is being addressed on a California level, and in particular with the San Francisco office of the RWQCB due to differences between regional water quality control boards around the state.

- A response to comments for IR Site 13, to solicit input for preparation of the draft no action remedial action plan, hasn't yet been completed.

## **OTHER BUSINESS:**

### **XI. Organization Business**

#### **TAPP Proposals for FY99**

Mr. Sullivan noted the TAPP proposal discussion earlier in the meeting and encouraged the membership to develop additional proposals during the coming year. Mr. Hansen recognized the efforts of Chris Shirley and Kavitha Rao in preparing the current TAPP proposal.

#### **Membership**

Mr. Sullivan noted that membership recruitment is on-going and that the Navy and the RAB needs to look at public forums that might provide an opportunity to solicit new membership. Alice La Pierre asked if notices are being run in the *San Francisco Weekly*. Mr. Sullivan replied that notices have been run on occasional basis for membership drives, but the Navy may need to consider running some more notices. He pointed out that ads in the *S.F. Weekly* and the *Guardian* are much less expensive than those in the *Chronicle* and the *Examiner*. Consideration may need to be given to conducting another full blown membership drive. Release of the EIS later this year may provide a good recruiting opportunity. New residents who will be leasing housing on TI by the end of the year will likely take interest in the cleanup and may also provide a new pool of potential members.

### **XII. Upcoming Environmental Report Review Schedule**

Mr. Sullivan noted that the only documents out for comment at the present time are the Phase Ia document, and as of tomorrow, the Phase Ib document.

### **XIII. Proposed Agenda Items**

#### **October**

- Draft Phase Ib SEBS Discussion
- Fuel Line Removal Report and UST Program

- Feasibility Study Workshop (tentative)

Mr. Sullivan stated that there are no firm agenda items for November and requested suggestions from the RAB. Topics could be discussed at either the interim meeting or at the October RAB meeting.

Mr. Aldrich requested a presentation on the environmental data management system. Mr. Sullivan responded that it may take a few months before the topic can be reported on because the Navy is just now issuing the contract. He offered to share the draft work plan with the RAB once it is complete.

Mr. Aldrich asked if there are data management systems in use at other installations involved in cleanup. Mr. Sullivan stated that NAS Alameda has a system, and several other bases have started them, but not every base has one. It was determined that a database management system would provide support to the TI cleanup program; all of the data collected during the program over the last year will be brought into one common format to be looked at both as a database and in conjunction with a map. There may be some information to report on at the November meeting.

Mr. Sullivan also recommended that RAB members keep some training topics in mind, because the November meeting may be a good time to provide additional training.

#### **XIV. Closing Remarks/End of Meeting**

Mr. Sullivan reviewed the following meeting schedule:

Next Regular Meetings:                   7:00 p.m. Tuesday, 20 October 1998  
  7:00 p.m. Tuesday, 17 November 1998

Interim Meeting:                         6:30 p.m. Wednesday, 7 October 1998  
  Location at either PG&E or Arc Ecology offices

BCT/RPM Meeting                        9:30 a.m. Monday, 5 October 1998  
  RWQCB Offices  
  1515 Clay St., Suite 1400, Oakland

TI Development Authority Meeting: 1:00 p.m. Wednesday, 16 September  
  Ferry Building, San Francisco

Mr. Hansen asked about the latest on the Yacht Club. Mr. Sullivan stated that the Navy either has or is in the process of leasing to the City the marina, consisting of the piers, the parking lot and a shed building. He added that he did not know what future plans there might be to have a clubhouse on the property that the Yacht Club could use.

Mr. Michelsen asked what Delancy Street will do with the lease. Mr. Sullivan indicated that there is a sign up on what used to be the Yacht Club building announcing an upcoming food facility there, however he did not know the details.

Mr. Sullivan adjourned the meeting at 9:37 p.m.

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TREASURE ISLAND  
SSIC NO. 5090.3

ATTACHMENTS A THROUGH C CAN BE FOUND IN THE:

DRAFT  
RESTORATION ADVISORY BOARD  
MEETING MINUTES

DATED 15 SEPTEMBER 1998

IS RECORD NO. N60028\_000916