



## Department of Toxic Substances Control

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March 4, 1999

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

### **DRAFT SITE 12 REMOVAL SITE EVALUATION AND ACTION MEMORANDUM FOR TIME-CRITICAL REMOVAL OF LEAD- CONTAMINATED SOIL (FEBRUARY 16, 1999)**

Dear Mr. Galang:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Site 12 Removal Site Evaluation and Action Memorandum for Time-Critical Removal of Lead-Contaminated Soil. DTSC has the following comments:

#### General Comments

1. If the Navy determines that Dioxin contamination needs to be addressed in the area covered by this action memorandum, then the action memorandum should be amended to include Dioxin.

#### Specific Comments

2. Page 1, Section 1.0, Introduction and Purpose

Please provide a brief discussion in this section on why the Navy believes that a time-critical removal action is warranted for the lead removal discussed in this action memorandum.

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3. Page 10, Section 5.4, Applicable or Relevant and Appropriate Requirements (ARAR)

Please discuss how the cleanup goal was selected and how the Navy determined that the US EPA's Preliminary Remediation Goal for lead is the appropriate ARAR when the DTSC lead model was used to assess the risk associated with lead.

4. Page 9, Section 5.1, Proposed Action Description

Please provide a figure that delineates the anticipated excavation area. This could be done with a dashed line, shading, etc. If buildings, roads, or other physical features could constrain the area of excavation and result in the need to leave contamination in place, then please discuss how the Navy anticipates performing the excavation in a way that would likely result in the least amount of contamination being left in place. The Navy should also discuss what will be done in the event that contaminants are left in place beneath structures and at depth in the water bearing zone.

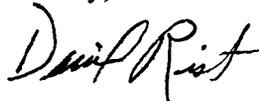
Also, please briefly discuss the pre-excavation and confirmation sampling strategy including the number of samples to be collected at each of the proposed locations and their corresponding depths.

5. Page 10, Section 5.6, Estimated Cost

The Navy has estimated the cost of the removal action to be \$90,000.00. Please provide a table that breaks down the estimated cost. This estimate should also include a discussion on how the Navy calculated the number of yards of soil that will be disposed of off-site.

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

Sincerely,



David Rist  
Hazardous Substances Scientist  
Office of Military Facilities

Mr. Ernesto Galang  
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cc: Mr. David Leland  
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