

California Regional Water Quality Control Board

San Francisco Bay Region



Gray Davis
Governor



Don H. Hickox
Secretary for
Environmental
Protection

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March 15, 1999
File: 2169.6013

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

Re: Comments on Draft Site 12 Corrective Action Plan for Time-Critical Removal of Petroleum Hydrocarbon-Contaminated Soil, Naval Station Treasure Island, San Francisco, California (dated February 16, 1999)

Dear Mr. Galang:

Thank you for the opportunity to review the above-referenced document. Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) staff comments are presented below. Comments of the Department of Toxic Substances Control (DTSC) are included as an attachment to this letter.

1. Section 1.0, second paragraph. Screening levels are described as "proposed interim". It is the understanding of the RWQCB staff that one of the outcomes of the November 19, 1998 Treasure Island Issues Resolution meeting was agreement to use 1.4 mg/L TPH in groundwater as the screening level for Site 12. In this case, the screening levels should not be described as proposed or interim.
2. Section 2.1. The site features mentioned in this section should be presented on a figure to assist the reader in understanding the locations of potential source areas.
3. Section 3.0. 1) This section should include a figure showing results of the IT sampling effort (when available), proposed excavation areas, site logistics (such as soil stockpile areas, truck access, and site controls), and other information that may be useful in understanding the proposed action. 2) This section should discuss corrective action technologies that were considered for this site. Several technologies frequently mentioned in conjunction with corrective action at TPH release sites are not discussed here. These include the use of biosparging to treat soils, soil vapor extraction, and use of oxygen releasing compounds.
4. Section 3.0, 2nd paragraph. Please explain how the pilot test results will be used. The schedule in Figure 3 shows draft groundwater design completion in March, before the pilot test is initiated. Also, please explain what effect the biosparging may have on soil TPH levels.
5. Section 3.2. The rationale for selecting these particular technologies should be more clearly explained. These technologies are not generally considered suitable for petroleum

releases, and as such offer little in the way of useful comparison to the excavation alternative. The comparison should be made against technologies generally considered suitable and proven for remediation of hydrocarbon releases. Several of these types of technologies are noted earlier in these comments.

- 6. Section 4.0. Given the proposed residential reuse in this area, and the extensive nature of the release, it will be necessary to consider a direct contact exposure pathway to residents in developing soil cleanup levels.

If you have any questions regarding these comments, please call me at 510-622-2377.

Sincerely,

David F. Leland, P.E.
Groundwater Protection and Waste
Containment Division

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Attachment

cc: Mr. James A. Ricks, Jr. (SFD-8-2)
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Mr. David Rist
Department of Toxic Substances Control
Northern California Region
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

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

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

cc: Paul Hehn
Pat Nelson
Nathan Brannan
Dale Smith
John Gregson
Humphrey Ho
John Allman
ARC Ecology
Don Marini (IT Corp)
Richard Knapp (TEMI)
Carol Yamane (Geomatrix)
Information Repository (3 copies)

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Department of Toxic Substances Control

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Gray Davis
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Environmental
Protection

CALIFORNIA REGIONAL WATER
MAR 04 1999
QUALITY CONTROL BOARD

March 3, 1999

Mr. David F. Leland, P.E.
California Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, California 94612

**DTSC COMMENTS ON THE DRAFT SITE 12 CORRECTIVE ACTION PLAN FOR
TIME-CRITICAL REMOVAL OF PETROLEUM HYDROCARBON-CONTAMINATED
SOIL, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA
(FEBRUARY 16, 1999)**

Dear Mr. Leland:

The Department of Toxic Substances Control (DTSC) has reviewed the referenced report and are providing comments as an enclosure with this letter.

If you have any questions regarding these comments, please call me at (510) 540-3763.

Sincerely,

A handwritten signature in cursive script that reads "David Rist".

David Rist
Hazardous Substances Scientist
Office of Military Facilities

Enclosure

DTSC COMMENTS ON THE DRAFT SITE 12 CORRECTIVE ACTION PLAN FOR TIME-CRITICAL REMOVAL OF PETROLEUM HYDROCARBON-CONTAMINATED SOIL, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA (FEBRUARY 16, 1999)

General Comments

1. "Proposed interim screening levels" are referenced throughout the Action Plan and are described as being still under negotiation between the Navy and the regulatory agencies. DTSC believes that an agreement was reached between the Navy and the regulatory agencies for total petroleum hydrocarbons (TPH) specifically for Site 12 at the November 19, 1998 Issues Resolution Meeting. Therefore, please remove from the Action Plan all references to interim screening levels.

Specific Comments

2. Page 1, Section 1.0, Introduction and Purpose

The third sentence in the second paragraph of this section is unclear. Please modify for clarification.

3. Page 7, Section 3.1, Recommended Alternative

Please amend Figure 2 to indicate the proposed excavation area boundaries. This could be done with shading, a dashed line, etc. Also, please show the levee that is immediately west of the Building 1311 and discuss how the levee may constrain the areas of excavation and how the Navy intends to deal with contamination that may be left in place.

The Navy has estimated the cost of the removal action to be \$90,000.00. Please provide a table that shows the costs associated with this estimate. 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.