

**MEMORANDUM**

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**TO: Treasure Island Restoration Advisory Board, and Jim Sullivan-NSTI**

**FROM: Paul V. Hehn, Treasure Island RAB** 

**DATE: March 16, 1999**

**RE: Comments on Document:  
"Draft Site 12 Removal Site Evaluation and Action Memorandum for  
Time-Critical Removal of Lead-Contaminated Soil"**

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The following are my comments on the above referenced document.

The comments that have been prepared are related to general issues and to specific sections of the report.

**Comments on Specific Sections**

- Section 2.2 - Site Characteristics - The depth to groundwater is stated to range from 0.6 to 5.3 feet bgs. Will the removal actions still be done if the depth to groundwater is very shallow at the time of the removal? If so, how deep with the removal action be? How will the sampling of the soil to validate the removal of all lead-impacted soil above the action level be done? Will water be pumped from the excavation if high groundwater level? How will the water be disposed and where?
- Section 2.5.1 - Previous Actions - Indicate the full range of lead concentrations detected at the site in the discussion.
- Section 2.5.2 - Current Actions - Add a discussion to this section about the additional drilling and sampling planned to precede the removal action even if performed by IT Corp.
- Section 3.1 - Threats to Public and Welfare - Include a discussion about possible dioxins in the soil in the same areas of this removal action as it may

apply to future residents of the housing area. Also give the range of lead that are present at the site. Should add dioxins to the list of analysis to be performed on the soil samples.

- Section 5.1 - Proposed Action Description - This section needs a lot more information and detail. It should include information about the overall work plan, including the work by the RAC contractor. There needs to be more information about:
  - How much soil will be removed?
  - How was the excavation size determined?
  - How they will determine when they have removed all of the impacted soil?
  - How the soil will be sampled?
  - How will the soil be analyzed?
  - Add dioxin to the list of analytes.
  - What are the excavation methods?
  - What is the anticipated size of the excavation?
  - Where excavated soil and any pumped out groundwater will be disposed of?
  - How deep the excavation will be?
  - Will they excavate below groundwater?
  - Will they sample below groundwater?
  - What happens if impacted soil appears to extend below building?
  - How close to buildings will they excavate?
  - What happens if impacted soil needs to be left below buildings?
- Schedule for Removal Actions - Need to add a list of acronyms.

cc: David Rist (DTSC)  
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