



Department of Toxic Substances Control

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May 17, 1999

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Ernesto Galang
900 Commodore Drive
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**FINAL SITE 12 REMOVAL SITE EVALUATION AND ACTION
MEMORANDUM, FINAL CONSTRUCTION OVERSIGHT WORK PLAN,
AND FINAL REMOVAL ACTION WORK PLAN FOR LEAD-
CONTAMINATED SOIL AT BUILDINGS 1207 AND 1209, NAVAL
STATION TREASURE ISLAND**

Dear Mr. Galang:

The Department of Toxic Substances Control (DTSC) has reviewed the above listed documents that together comprise the Removal Action Work Plan (RAW) for Lead-Contaminated Soil at Buildings 1207 and 1209 in the residential area at the northern end of Treasure Island. DTSC has the following comments:

General Comments

1. None of the three documents contains the criteria for establishing what class of landfill the excavated soil will be disposed to. Table 1 in the Site 12 Removal Site Evaluation and Action Memorandum indicates that a Class II landfill will be used for the disposal of the excavated soil. This is a premature conclusion as the soil has yet to be classified.

Please include in the documents the criteria that will be used to determine the class of landfill the excavated soil will be disposed to and ensure that the three documents comprising the RAW are consistent.

2. Sections in each of the three documents that discuss site restoration activities, and specifically, the use of replacement soil, are not consistent.

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Each of the documents should indicate that "clean imported soil" will be used to backfill the excavation.

Site 12 Removal Site Evaluation and Action Memorandum Specific Comments

3. Page 7, Section 5.1, Proposed Action Description

This section indicates that buildings may require removal and that the Navy will make this decision by assessing the costs and benefits associated with removing and replacing the buildings as opposed to imposing an institutional control for the contaminants left in place. DTSC believes that the regulatory agencies and the City of San Francisco need to be a part of this decision making process as actions that address contamination are considered remedial actions that are a part of the Comprehensive Environmental Response Compensation, and Liability Act (CERCLA) process.

Also, the last paragraph of this section needs to be modified to indicate that "clean imported soil" will be used to backfill the excavation.

4. Page 11, Table 1

It is not clear what comprises some of the items included in this table. For example, does resurfacing and landscaping include any repaving of the road that may be necessary? If not, repaving and its associated costs should be identified as a separate item. To help the reader understand the costs associated with the items in this table, it may help to explain some of the items in detail in an appropriate section within the work plan.

Please include the costs associated with the purchase and hauling of the imported clean soil that will be used for backfilling.

Also, how has the Navy determined that the soil will be going to a Class II landfill when characterization of the soil has not occurred? Please revise the table and include as an alternative, a cost estimate for the disposal of the excavated soil at a Class I landfill.

Please include the costs associated with the disposal of construction debris that are mentioned in the Removal Action of Lead Contaminated Soil Work Plan.

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Construction Oversight Work Plan Specific Comments

5. Page 1, Section 1.0, Introduction and Purpose

This section indicates that other constituents detected in the burn pit will be removed in conjunction with the lead. Please indicate that these constituents were detected at levels that do not warrant a removal action and that if an action were not being performed to address the lead contamination, these constituents would be left in place as they do not pose an unacceptable risks to human health or the environment.

6. Page 8, Section 5.0, Confirmation Sampling Activities

Please see general comment number one.

Removal Action of Lead Contaminated Soil Work Plan Specific Comments

7. Page iii, List of Figures

Figure 3 should be changed to read "Buildings 1207 and 1209..."

8. Page 1-1, Section 1.0, Introduction

Please remove the word "California" from the first sentence of this section.

9. Page 4-5, Section 4.6, Collecting of Soil Samples

See general comment number one.

10. Page 4-6, Section 4.7, Backfilling/Soil Compaction

Please see general comment number two.

11. Page 4-7, Section 4.9, Site Restoration

The last sentence of this section indicates that the Navy will decide whether pavement and/or carport structures will be reconstructed. This is inconsistent with statements made in the Site 12 Removal Site Evaluation and Action Memorandum. The Action Memorandum indicates that these

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types of structures will be reconstructed. Please clarify.

12. Page 4-7, Section 4.11, Transporting and Disposing of Excavated Soil

Please see general comment number one.

13. Page 5-2, Section 5.2.2, Dust Control

This section indicates that fugitive dust emissions may be controlled by spraying water from a water truck. A water truck is not accounted for in the cost estimate prepared by the Navy. If it is anticipated that a water truck will be used then please indicate this and include it as an item in Table 1 of the Removal Site Evaluation and Action Memorandum.

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

Sincerely,



David Rist
Hazardous Substances Scientist
Office of Military Facilities

cc: See next page.

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