



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
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TREASURE ISLAND
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August 2, 2006
File No. 2169.6013 (AF)

U.S. Department of the Navy
Attn: Ms. Lara Urizar
BRAC Program Management Office - West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

SUBJECT: Water Board comments on Draft Feasibility Study Report Installation Restoration Site 30 Daycare Center, Naval Station Treasure Island, San Francisco dated July 2006

Dear Ms. Urizar:

Upon review of the subject report, I have the following minor comments:

1. ES-4 and Section 3.1: The remedial action objectives specify protecting commercial/industrial, residential and daycare center receptors by preventing ingestion and direct contact with contaminated soils. However, according to Table 2-1, the only COPCS exceeding thresholds are under the hypothetical alternate land use whereby receptors are exposed to site-wide soil and vapors in indoor air. Explain why preventing the exposure of receptors to vapors in indoor air is not included in the remedial action objectives.
2. Section 2.4.7.1: The following statement is repeated several times; "Since groundwater is not a current or potential drinking water source at Site 30, it was not evaluated as a potential exposure pathway". This statement implies that exposure pathways to contaminated groundwater were not evaluated because it is not a drinking water source. However, the potential for inhalation of vapors originating from groundwater was evaluated for commercial/industrial workers and adult and child residents and the potential for dermal contact with groundwater was evaluated for the construction worker. The statement should be clarified to state that the *consumption* of groundwater was not evaluated as a potential exposure pathway since groundwater is not a current or potential drinking water source.

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3. Section 2.4.7.3: The description of the three metals detected in soil is confusing and should be reworded. For example, the description for lead should state "Lead was present above ambient concentrations in 82 of the 152 samples, but was above the residential PRG in only three samples". Similarly, the description for vanadium should state "Vanadium was present above ambient concentrations in 23 of 98 samples, but only one sample had a concentration above the residential PRG".
4. Section 4.2.4.5: Explain why leaving soil in place to protect the integrity of the existing daycare center building slab is inconsistent with the current and future use of the site and building as a daycare center.
5. Section 4.4.3: The description of the site hydrogeology states that groundwater was encountered at approximately five feet below ground surface. Provide a rationale for requiring excavation to a depth of six feet under Alternative 3 (Building Demolition, Excavation, and Off-Site Disposal at a Permitted Landfill).
6. Section 6.3: Explain why the magnitude of residual risk remaining after implementation of Alternative 2 (Engineering Controls Combined with ICs) would not be less than residual risk remaining after implementation of Alternative 1 (No Action).

If you have any questions or would like to discuss these comments, please contact me via phone (510.622.2401) or email (AFarres@waterboards.ca.gov).

Sincerely,



Agnes Farres
Project Manager

Ms. Lara Urizar

August 2, 2006

Enclosure

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