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DRAFT FEASIBILITY STUDY REPORT, INSTALLATION RESTORATION SITE 30, DAY CARE CENTER, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA

Dear Ms. Urizar

The Department of Toxic Substances Control (DTSC) staff reviewed the Draft Feasibility Study (FS) for Installation Restoration (IR) Site 30, dated July 2006. The stated purpose of the FS is to develop and evaluate remedial action alternatives necessary to address potential human health risks associated with contaminated soils adjacent to and beneath Building 502 at Site 30. The Site 30 Human Health Risk Assessment determined that polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (dioxins) were the primary risk drivers under the hypothetical alternate land use scenarios (residential or commercial/industrial). Currently, Building 502 is leased to the City of San Francisco and is operated by the Treasure Island Homeless Development Initiative as a daycare center. The FS also indicates that Building 502 will continue to operate as a daycare center after transfer to the City of San Francisco. Below are DTSC's comments on the Site 30 FS.

General Comments

1. When discussing groundwater at Site 30, the Navy has concluded that contaminants detected in groundwater do not need to be evaluated as

potential risk drivers because the State Water Board has concurred that NSTI meets the exemption criteria for drinking water use. DTSC disagrees with this position and believes that when contaminants in groundwater are detected at concentrations exceeding State of California Maximum Contaminants Levels (MCLs), then a remedy must be applied to ensure that groundwater is not developed for future use. When groundwater at a site has been exempted as a beneficial source, other uses (i.e., fire suppression, process and irrigation water) are still permitted and need to be addressed in the final remedy. Therefore, when a site does have contaminants in groundwater exceeding MCLs, an institutional control restricting the future development of ground water for any type of use needs to be included as part of the overall remedy for the site. However, since all of the VOCs detected in groundwater at Site 30 were reported below MCLs, an IC for these contaminants will not be necessary.

2. The document alternatively refers to the asphalt and cement pad, that was installed adjacent to Building 502 as part of the time-critical removal action in 2003, as either a slab or pad. As a result it is often difficult to determine if the building pad or the adjacent slab is being referred to. DTSC suggest that the Navy use consistent language when referring to the slab adjacent to the building and that the cement pad beneath the building always be referred to as the building pad.

Specific Comments

1. Page 10, Section 2.4.5, Time-Critical Removal Action at Site 30

The last sentence of this section uses the word "pad" when referring to the 1400 square foot asphalt and cement slab that was installed adjacent to the daycare center building. Please correct. Also, please clearly state that the slab was installed to prevent exposure to the known dioxin contamination that exist in surface soils adjacent to Building 502.

2. Page 12, Section 2.4.7.3, Nature and Extent of Contamination

The TPH screening values presented in this section appear to be for non-residential reuse and not residential (5,900 mg/kg for gasoline, 6,700 mg/kg for diesel, and 9,400 mg/kg for motor oil). The Navy and regulatory agencies previously established residential screening criteria for TPH in shallow soils which are: gasoline at 1,030 mg/kg; diesel at 1,380 mg/kg; and motor oil at 1,900 mg/kg. Please amend this section to reflect the previously agreed upon screening values.

3. Page 32, Section 4.4.2, Alternative 2: Engineering Controls Combined with ICs and Section 4.4.2.2, Institutional Controls

   This section concludes that the site-related risk, as a daycare center or under a future residential scenario, is within the risk management range and that ICs are only necessary to address the uncharacterized waste remaining beneath Building 502. DTSC disagrees with this position as dioxins resulting in a risk greater than E10-6 are known to exist adjacent to Building 502 and are also likely to exist in the waste debris continuing beneath the building. To protect the current and potential future users of the site, as a daycare center or a residential development, DTSC believes that an IC that addresses all of the dioxins, beneath both the building and adjacent slab, is necessary.

4. Page 33, Section 4.4.3, Alternative 3: Building Demolition, Excavation, and Off-Site Disposal at a Permitted Landfill

   In Alternative 3, which provides for the removal of all dioxin contaminated soil to a depth of six feet below ground surface, the Navy makes the assumption that after the removal, all of the removal action objectives will have been achieved and that ICs will not be necessary. While the removal of six feet of contamination beneath the existing slab and building may remove a significant portion of the dioxins, it cannot be stated that all of the dioxins will be removed thereby obviating the need for ICs following the removal action.

5. Page 43, Section 5.3.7, Cost

   The last sentence of this section states that the total cost for ICs does not include the cost of enforcing the IC components. Please discuss what the anticipated "enforcement cost" are and why they were not included as part of the overall cost.

6. Page 44, Section 5.4.3, Long-Term Effectiveness and Permanence

   Alternative 3 may provide for unrestricted commercial/industrial or residential reuse, if all of the contamination is successfully removed. Please clarify.

7. Figures 4 and 5, Site 30 Features Map and Dioxins in Soil

   The legend refers to the slab adjacent to Building 502 as a "pad". Please correct.

8. Appendix B, Page B-3, Section B5.2, Annual O&M or Periodic Costs

   The costs for enforcing the IC components are mentioned in Section 5.3.7, Cost, but are not included in Section B5.2. Again, please briefly discuss what costs are associated with enforcing the IC components and why they were not included as part of the overall costs.

9. Appendix B, Page B-6, Section B6.1, Alternative 2, Engineering Controls Combined With Institutional Controls

   It should be noted that if ICs are implemented and subsequently violated in the future, DTSC's oversight requirements could easily exceed 10 hours in a given year.

If you have any questions regarding this letter or if you would like to arrange a meeting to discuss specific issues, please call me at (510) 540-3763.

Sincerely,

David Rist

David Rist
Hazardous Substances Scientist
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cc: See next page.

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