

August 14, 2006
Project 4850.005.3

Mr. James Sullivan
Ms. Lara Urizar
Department of the Navy
Base Realignment and Closure Program management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Subject: Comments on July 2006 Draft Feasibility Study Report
 Installation Restoration Site 30, Daycare Center
 Naval Station Treasure Island, San Francisco, California

Dear Mr. Sullivan and Ms. Urizar:

At the request of the Treasure Island Development Authority (TIDA), Geomatrix Consultants, Inc. (Geomatrix) has reviewed the Draft Feasibility Study Report for Installation Restoration Site 30 (Site 30 FS), and we have prepared the following comments. We did not review sections pertaining to Applicable or Relevant and Appropriate Requirements (ARARs) as we understand that the Navy has worked closely with regulatory agencies to identify the ARARs and we defer to their expertise.

GENERAL COMMENTS

1. The human health risk assessment included in Appendix I of the Final Remedial Investigation (RI) Report for Site 30 included a discussion about risk posed to current utility workers (Section I.8.1.2 of Appendix I of RI Report). This information needs to be included in the risk assessment summary presented in Section 2.4.7.5 and the Executive Summary of the Site 30 FS. This assessment should provide the Navy's justification for why no remedial actions are necessary to protect current subsurface workers (e.g., landscape workers and utility workers) who may be exposed to soil outside the footprint of Building 502.
2. The text states that based on recent comments from officials at the City and County of San Francisco, Site 30 is expected to continue as a daycare center (Executive Summary, p. ES-2 and Section 2.3.6). We wish to clarify that the current development plans do anticipate interim use of the existing building as a daycare center for several years; however, the ultimate development plans do not include the existing building or a daycare center at the existing location. Please provide this additional information in the two sections noted.

SPECIFIC COMMENTS

1. **Reference to City of San Francisco.** Throughout the document, the text refers to the “City of San Francisco.” The text should refer to the “City and County of San Francisco.”
2. **Executive Summary, page ES-1, first paragraph under Site History.** The daycare center was renovated and reopened in 2003 by Kidango, rather than the Treasure Island Homeless Development Initiative.
3. **Executive Summary, page ES-2, last paragraph under Site Setting.** Please clarify that the removal actions were completed before the center was opened by Kidango in 2003.
4. **Executive Summary, page ES-3, second paragraph under Baseline Risk Assessment.** This paragraph indicates that contaminants in groundwater were not evaluated in the risk assessment. This is not correct. The risk assessment evaluated vapor intrusion from chemicals in groundwater (current and hypothetical future buildings) and direct contact with groundwater for hypothetical future construction workers and current utility workers.
5. **Executive Summary, page ES-4, Remedial Action Objectives (RAOs).** For the first RAO, please clarify that it pertains to potential future commercial/industrial and residential receptors. This comment also applies to Section 3.1.
6. **Executive Summary, page ES-5, Detailed Comparative Analysis of Remedial Alternatives.** This section explicitly discusses how the alternatives compare for each of the threshold criteria, but does not provide the same level of discussion for the primarily balancing criteria. We suggest that this section discuss how the alternatives compare for each of the balancing criteria.
7. **Section 2.3.2, last paragraph, top of page 6.** The text states that documentation about the “old trash dump” in the middle of 11th Street was discovered during the environmental baseline survey completed to support the Finding of Suitability to Lease (FOSL). The FOSL was completed in 1997 and we understand that the documentation about the “old Trash dump” was discovered later than 1997. This comment also applies to the Site History section of the Executive Summary.
8. **Section 2.4.7.1.** There are several places in this section where the text states that groundwater was not evaluated as a potential exposure pathway in the RI. While direct ingestion of groundwater was not evaluated for the reasons cited in the text, other exposure pathways for groundwater were evaluated. See comment 3.

9. **Section 2.4.7.3, first paragraph.** Please identify which pesticide exceeded its residential PRG.
10. **Section 4.2, Identification and Screening of Remedial Action Technology and process Options.** This section does not consistently discuss each technology with respect to the three screening criteria (effectiveness, implementability and cost). Most notably, the screening criteria are not discussed in the description of the various institutional controls that are presented. We suggest that Table 4-1 be revised to include headings for each of the three screening criteria. This information would better justify the evaluation result.
11. **Section 4.2.2.** The discussion of potential institutional controls includes a description of deed restrictions (fourth paragraph of Section 4.2.2.1) and groundwater use restrictions (Section 4.2.2.2, third paragraph). However, this information is missing from Table 4-1.
12. **Section 4.2.3.1, last paragraph.** The three reasons cited for eliminating containment for further consideration are also true for excavation, which was retained for further consideration. The document needs to provide better justification for eliminating containment.
13. **Section 4.2.4.** This section defines active remediation to be removal of contaminants from the site. Active remediation can include other treatment technologies (as discussed in later subsections). We suggest broadening the definition of active remediation.
14. **Section 4.2.4.3.** It is incorrect to say that thermal desorption is limited by the depth of the groundwater table. Resistive heating actually requires water to function efficiently.
15. **Section 4.2.4.5, second to last sentence.** It appears that the word “inconsistent” should be “consistent.”
16. **Section 4.4.2.** Under the day care center use, the text states that the “site-related risk is either below or within the risk management range.” Elsewhere in the document, the text states that the risk is below (not within) the risk management range. Please correct.
17. **Section 4.4.3.** It is unclear why Alternative 3 does not include replacement of the daycare center building (i.e., site restoration) and temporary re-location of the daycare facilities during remediation. These costs need to be considered for maintaining current site use.
18. **Section 6.3.** The text states that Alternative 3 provides a higher level of long-term effectiveness and permanence than Alternative 2. We concur with this conclusion.

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However, Table 6-2 shows the two alternatives as having equal long-term effectiveness and permanence. The table should be revised to be consistent with the text.

19. **Table 6-2.** Under the criteria "Reduction in Toxicity, Mobility, or Volume through Treatment," it would appear that Alternative 3 should be ranked higher than Alternatives 1 and 2 because the on-site volume would be reduced. Given the qualitative nature of the ranking of each alternative according to the six criteria, it appears that the "Overall Rank by Alternative" is very subjective. We suggest eliminating the overall rank from the table.
20. **Appendix B.** In general not enough explanation is provided to justify the costs. Although very detailed costs are implied, the scope of the activities described is very vague. Notes should be provided giving the source and basis for each quantity and unit cost.
21. **Appendix B, Tables B-1A and B-1B.** Capital costs do not include the contingencies required by EPA's "A Guide to Developing and Documenting Cost Estimates During the Feasibility Study." There are inconsistencies between labor rates for Work Plans and Reports and those for Administrative Land Use Controls. For Alternative 3 (Table B-1B), it is unclear whether the costs for "Pre-Excavation Characterization Sampling and Analysis" include labor for field oversight, data QA/QC and reporting.

We appreciate the opportunity to review the draft document. Please feel free to contact me if you have any comments.

Sincerely yours,
GEOMATRIX CONSULTANTS, INC.



Gary R. Foote, P.G.
Principal Geologist

GF/bg

cc: Mr. Marc McDonald, Treasure Island Development Authority
Mr. Jack Sylvan, Treasure Island Development Authority
Mr. James Ricks, U.S. Environmental Protection Agency, Region IX
Mr. David Rist, Cal EPA Department of Toxic Substances Control
Ms. Agnes Farres, Cal EPA Regional Water Quality Control Board
Mr. Keith Sheets, CH2M Hill