



DEPARTMENT OF THE NAVY  
BASE REALIGNMENT AND CLOSURE  
PROGRAM MANAGEMENT OFFICE WEST  
1455 FRAZEE RD, SUITE 900  
SAN DIEGO, CA 92108-4310

5090  
Ser BPMOW.CP/0313  
MAR 07 2008

Mr. Ryan Miya,  
California Department of Toxic Substances Control  
Office of Military Facilities  
700 Heinz Avenue, Suite 200  
Berkeley, Ca 94710-2737

Dear Mr. Miya:

Subj: SITE 30, DAYCARE CENTER & SITE 31 FORMER SOUTH STORAGE YARD,  
RESPONSE TO COMMENTS ON THE DRAFT PROPOSED PLANS/REMEDIAL  
ACTION PLANS, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO,  
CALIFORNIA

The Sites 30 and 31 Response to Comments (RTCs) on the draft Proposed Plans/Remedial Action Plans are provided for your review, comment, and/or concurrence (enclosure (1)). The Navy would like to discuss these RTCs in a conference call so that the Proposed Plans can be issued to the public and a public meeting can be scheduled for April 15, 2008.

For further information, please contact Mr. Charles Perry at (619) 532-0911.

Sincerely,

A handwritten signature in black ink, appearing to read "James B. Sullivan", written over a white background.

for  
JAMES B. SULLIVAN  
BRAC Environmental Coordinator  
By direction of Director

Encl: (1) Response to Comments on the Draft Proposed Plan/Remedial Action Plan at Site 30, Daycare Center, and Site 31, Former South Storage Yard, Naval Station Treasure Island, San Francisco, California

5090  
Ser BPMOW.CP/0313  
MAR 07 2008

Distribution:

Ms. Christine Katin, U.S. Environmental Protection Agency, Region IX  
Mr. Paisha Jorgensen, California Regional Water Quality Control Board  
Ms. Marian Saez, Treasure Island Development Authority (w/out enclosure)  
Mr. Jack Sylvan, Mayor's Office of Base Reuse and Development (w/out enclosure)  
Mr. Gary Foote, Geomatrix  
Ms. Erika Richard, Director Kidango Daycare Center  
Mr. Jeff Austin, Lennar Communities  
Mr. Randy Brandt, LFR, Inc.  
Ms. Marcie Rash, Tetra Tech EM Inc.

Community RAB Members:

Mr. Nathan Brennan  
Ms. Dale Smith  
Mr. Douglas Ryan  
Ms. Alice Pilram  
Mr. Saul Bloom, ARC Ecology

**Document Title:**

**Proposed Plan/Draft Remedial Action Plan for Site 30, Daycare Center, Naval Station Treasure Island, March 2007**

Reviewer: Henry Wong, DTSC

Comment Date: February 4, 2008

Comment No.	Comment	Response
	<p>General Comment: Comments were received as edits in "track changes" mode in the Proposed Plan Microsoft Word document. The main comments and issue are listed here.</p>	
	<p>Page 4, Human Health Risk Assessment, second paragraph. DTSC revised the paragraph as follows:                       "Estimated excess cancer <b>risk</b> for a daycare center child, construction worker, a hypothetical future commercial/ industrial worker, and child/adult resident were within EPA's <b>risk management range.</b>"</p>	<p>According to the FS, the risk for daycare center child and staff are below the risk management range. The FS states: "The risk at the site for daycare center adults and children under current and future use configuration as a daycare center, including the location under the asphalt and concrete pad and unpaved areas, is below the risk management range of <math>1 \times 10^{-4}</math> to <math>1 \times 10^{-6}</math>."</p> <p>Recommend keeping the original text:                       "Estimated excess cancer <b>risk</b> for a daycare center child and construction worker was below the levels the EPA considers safe. These results indicate that the site does not pose an <b>unacceptable risk</b> to these receptors. Estimated excess cancer risk for a hypothetical future commercial/industrial worker and child/adult resident were within EPA's <b>risk management range.</b>"</p>

Document Title:

Proposed Plan/Draft Remedial Action Plan for Site 30, Daycare Center, Naval Station Treasure Island, March 2007

Reviewer: Henry Wong, DTSC

Comment Date: February 4, 2008

Comment No.	Comment	Response															
1	<p>Page 4, Summary of Site Risks, end of section. The following was added:</p> <p>"The following table highlights the cancer risks and noncancer hazards for receptors from a State HHRA:</p> <table border="1" data-bbox="331 532 1024 732"> <thead> <tr> <th></th> <th>Cancer Risk</th> <th>Noncancer Hazard</th> </tr> </thead> <tbody> <tr> <td>Daycare Center Child</td> <td>1x10<sup>-6</sup></td> <td>0.3</td> </tr> <tr> <td>Construction Worker</td> <td>1x10<sup>-6</sup></td> <td>0.4</td> </tr> <tr> <td>Future Resident</td> <td>2x10<sup>-5</sup></td> <td>1</td> </tr> <tr> <td>Future Commercial/Industrial Worker</td> <td>5x10<sup>-6</sup></td> <td>0.1</td> </tr> </tbody> </table> <p>Since the soils beneath Building 502 are uninvestigated and the dioxin hotspots beneath the Site 30 Concrete Pad are unremediated, a potential health concern exists from dioxins for future residential and/or commercial/industrial users."</p>		Cancer Risk	Noncancer Hazard	Daycare Center Child	1x10 <sup>-6</sup>	0.3	Construction Worker	1x10 <sup>-6</sup>	0.4	Future Resident	2x10 <sup>-5</sup>	1	Future Commercial/Industrial Worker	5x10 <sup>-6</sup>	0.1	<p>The risk values were not included in the PP/draft RAP in order to minimize confusion to the average reader. This information is available in the archived documents for those readers seeking additional information.</p> <p>The last sentence will added with the following changes: "Since soils beneath Building 502 are uninvestigated and dioxin sample points beneath the Site 30 Concrete Pad remain in place, a potential health concern exists from dioxins for future residential and-or commercial/industrial users."</p>
	Cancer Risk	Noncancer Hazard															
Daycare Center Child	1x10 <sup>-6</sup>	0.3															
Construction Worker	1x10 <sup>-6</sup>	0.4															
Future Resident	2x10 <sup>-5</sup>	1															
Future Commercial/Industrial Worker	5x10 <sup>-6</sup>	0.1															
2	<p>Page 4, Remedial Action Objectives. DTSC added the following underlined text:</p> <ul style="list-style-type: none"> <li>To protect future commercial/industrial and residential receptors by preventing the ingestion of and direct contact with soil containing unknown concentrations of dioxin beneath Building 502 <u>and Site 30 Concrete Pad.</u></li> <li>To protect current daycare center receptors by preventing the ingestion of, and direct contact with, soil containing unknown concentrations of dioxins beneath Building 502 <u>and Site 30 Concrete Pad.</u></li> </ul>	<p>The first bullet will be reworded to state "unknown concentrations beneath Building 502 and known concentrations under the Site 30 Pad.</p> <p>The concentrations beneath the concrete pad are known, and were used to calculate site risks for the daycare child and worker. Therefore, the concrete pad should not be included in bullet #2.</p>															

Document Title:

Proposed Plan/Draft Remedial Action Plan for Site 30, Daycare Center, Naval Station Treasure Island, March 2007

Reviewer: Henry Wong, DTSC

Comment Date: February 4, 2008

Comment No.	Comment	Response
3	<p>Page 5, Alternative 2, second paragraph. DTSC revised the text as follows:</p> <p>The results of the risk assessment indicate that there are no unacceptable risks for the current and use of Building 502 on Site 30 as a daycare center. <u>However, a cancer risk of <math>2 \times 10^{-5}</math> and noncancer hazard of 1 are estimated for future residents if the Site 30 Concrete Pad adjacent to Building 502 were to be removed. Since the nature and extent of dioxin in soil beneath Building 502 has not been characterized, there is a need to prevent exposure to potentially contaminated soils beneath Building 502.</u> Under Alternative 2, the existing daycare center building slab and <u>Site 30 Concrete Pad</u> would be maintained as an exposure prevention barrier. The existing slab and pad are not likely to require maintenance to continue serving as an exposure prevention barrier; however, periodic inspections would be required to verify its integrity.</p>	<p>In order to present a simplified description of site risks for public consumption, the original text did not include risk values. The risk values are available in the archived documents.</p> <p>Maintenance of the concrete slab is not proposed as an engineering control under Alternative 2 because there is no risk under current use as a daycare center, even if the slab is removed. The land use restrictions prohibiting future residential or commercial/industrial use will prevent exposure by these receptors to dioxins in soil beneath the pad.</p> <p>The paragraph will be reworded as follows:                      The results of the risk assessment indicate that there are no unacceptable risks for the current and future use of Building 502 on Site 30 as a daycare center. Since the nature and extent of dioxin in soil beneath Building 502 has not been characterized, there is a need to prevent exposure to potentially contaminated soils beneath Building 502. Under Alternative 2, the existing daycare center building slab would be maintained as an exposure prevention barrier. The existing slab is not likely to require maintenance to continue serving as an exposure prevention barrier; however, periodic inspections would be required to verify its integrity.</p>

**Document Title:**

**Proposed Plan/Draft Remedial Action Plan for Site 30, Daycare Center, Naval Station Treasure Island, March 2007**

Reviewer: Henry Wong, DTSC

Comment Date: February 4, 2008

Comment No.	Comment	Response
4	<p>Page 3, Alternative 2, bullets after third paragraph. DTSC added the following:</p> <ul style="list-style-type: none"> <li>• A "Covenant to Restrict Use of Property, Environmental Restriction" to (1) prohibit any removal or penetration of the Building 502 slab and Site 30 Concrete Pad, (2) require periodic inspection and reporting of the Building 502 slab and Site 30 Concrete Pad with provisions for making utility repairs, as necessary, and (3) require remedial investigation and any necessary remediation beneath Building 502 and Site 30 Concrete Pad upon building demolition and pad removal.</li> <li>• An Implementation and Enforcement Plan to specify the roles and responsibilities for implementing, monitoring, and enforcing the covenant provisions.</li> <li>• A Deed Notice to notify the public of the existence of potential contamination.</li> </ul>	<p>The level of detail specified is not warranted in the Proposed Plan/draft RAP. The specific information required for the ICs will be developed in the ROD/final RAP and RD/RA phases.</p>
5	<p>Page 7, Item 4. Reduction of Toxicity, Mobility, and Volume. DTSC comment: Please rewrite this section since the fourth NCP criterion includes evaluation of contaminant volume reduction (i.e. Alternative 3 – excavation). Please note that this criterion is not limited to treatment only.</p>	<p>This section is a summary of the evaluation presented in the feasibility study. The following sentence will be added: "Removal of soil in Alternatives 3 reduces the overall mobility of contaminants by placing them in an approved landfill."</p>
6	<p>Pages 9, 10, and 11. DTSC proposed edits to the community participation section, glossary of terms, and contact information.</p>	<p>Changes will be incorporated as suggested.</p>

Document Title:

Proposed Plan/Draft Remedial Action Plan for Site 31, Former South Storage Yard, Naval Station Treasure Island, March 2007

Reviewer: Henry Wong, DTSC

Comment Date: February 4, 2008

Comment No.	Comment	Response																		
	General Comment: Comments were received as edits in "track changes" mode in the Proposed Plan Microsoft Word document. The main comments and issue are listed here.																			
1	Page 2, Nature and Extent of Contamination, fourth paragraph: DTSC recommended addition of five chemicals to the COC list, PAHs, naphthalene, motor oil, diesel, and copper.	COCs are clearly designated in the FS as benzo(a)pyrene, dioxins, and lead. The proposed plan will remain consistent with FS COCs.																		
2	Page 4, first column, second paragraph: DTSC recommended adding "Elevated soil concentrations of benz(a)pyrene, benzo(a)anthracene, dioxins, and other carcinogenic PAHs identified as risk drivers were mostly limited to hot spots (Debris Areas C and D).	It is unclear why benzo(a)anthracene was added to this list, when it is covered under the phrase "other carcinogenic PAHs". The COCs designated in the FS will be used to avoid confusion.																		
3	<p>Page 4, bottom of first column: DTSC added the following:</p> <p>The following table highlights the cancer risks and noncancer hazards for receptors from a State HHRA:</p> <table border="1" data-bbox="365 914 1058 1110"> <thead> <tr> <th>Receptors</th> <th>Cancer Risk</th> <th>Noncancer Hazard</th> </tr> </thead> <tbody> <tr> <td>Elementary School Child</td> <td>2x10<sup>-5</sup></td> <td>0.2</td> </tr> <tr> <td>Elementary School Staff</td> <td>4x10<sup>-5</sup></td> <td>0.2</td> </tr> <tr> <td>Construction Worker</td> <td>5x10<sup>-6</sup></td> <td>0.8</td> </tr> <tr> <td>Future Resident</td> <td>3x10<sup>-3</sup></td> <td>25</td> </tr> <tr> <td>Future Commercial/Industrial Worker</td> <td>4x10<sup>-4</sup></td> <td>2</td> </tr> </tbody> </table>	Receptors	Cancer Risk	Noncancer Hazard	Elementary School Child	2x10 <sup>-5</sup>	0.2	Elementary School Staff	4x10 <sup>-5</sup>	0.2	Construction Worker	5x10 <sup>-6</sup>	0.8	Future Resident	3x10 <sup>-3</sup>	25	Future Commercial/Industrial Worker	4x10 <sup>-4</sup>	2	The risk values were not included in the PP/draft RAP in order to minimize confusion to the average reader. This information is available in the archived documents for those readers seeking additional information.
Receptors	Cancer Risk	Noncancer Hazard																		
Elementary School Child	2x10 <sup>-5</sup>	0.2																		
Elementary School Staff	4x10 <sup>-5</sup>	0.2																		
Construction Worker	5x10 <sup>-6</sup>	0.8																		
Future Resident	3x10 <sup>-3</sup>	25																		
Future Commercial/Industrial Worker	4x10 <sup>-4</sup>	2																		
4	Page 4, Box "What are the "Chemicals of Concern"": DTSC added PAHs and Naphthalene.	The description of PAHs was added. Naphthalene was not added, as it is not designated a COC for Site 31.																		
5	Page 5, Remedial Action Objectives: DTSC replaced B(a)P with "PAHs" throughout the section.	The Remedial Action Objectives detailed in the FS specify B(a)P. The PP/draft RAP will remain consistent with the FS.																		
6	Page 6, Alternative 5, first paragraph. DTSC Comment: Please provide all target cleanup concentrations for the COCs. Please describe the decision criteria for any exceedances (i.e., any location with COC concentrations above the target cleanup levels will be re-evaluated and followed with subsequent confirmation sampling).	<p>Specific concentrations were omitted in order to provide information that is easily understood by the general public.</p> <p>The following sentence has been added: "Sampling will be conducted to assure removal of contaminants to below target cleanup concentrations".</p>																		

**Document Title:****Proposed Plan/Draft Remedial Action Plan for Site 31, Former South Storage Yard, Naval Station Treasure Island, March 2007**

Reviewer: Henry Wong, DTSC

Comment Date: February 4, 2008

Comment No.	Comment	Response
7	Page 6, Alternative 5, first paragraph. DTSC comment: Please describe the decision criteria when groundwater is reached.	The following sentence has been added: "Groundwater is expected to be 5 to 7 feet below ground surface at Site 31. Soil will be excavated to the depth necessary to remove the contaminants."
8	Page 7, Evaluation of Alternatives, second paragraph. DTSC Comment: Please check with FS Section 6.5 and determine whether the schoolyard (i.e., Debris Area A, B, and C) street (i.e., Debris Area D and E), and parking lot (Debris Area D) replacement costs are included.	Costs for replacement of the schoolyard, asphalt, parking lot and sidewalk are included in the costs; see Appendix C, Cost Estimates. However, replacement of hard surfaces will be a management decision during the remedial design process.
9	Page 8, Item 4. Reduction of Toxicity, Mobility, and Volume. DTSC Comment: Please rewrite this section since the fourth NCP criterion includes evaluation of contaminant volume reduction (i.e., Alternatives 3, 4, and 5). Please note that this criterion is not limited to treatment only.	This section is a summary of the evaluation presented in the feasibility study. The following sentence will be added: "Removal of soil in Alternatives 3, 4, and 5 reduces the overall mobility of contaminants by placing them in an approved landfill."
10	Page 9. DTSC inserted text concerning CEQA and Nonbinding Allocation of Responsibility.	The Nonbinding Allocation of Responsibility section will be reduced to just the first sentence and last two sentences, in order to improve readability for the general public.
11	Pages 9, 10, and 11. DTSC proposed edits to the community participation section, glossary of terms, and contact information.	Changes will be incorporated as suggested.

Document Title: Draft Proposed Plan, Site 30, Daycare Center, Naval Station Treasure Island

Report Date: March 2007

Reviewer: Christine Katin, Environmental Protection Agency Review Date: April 2007

Comment No.	Section/ Page No.	Comment	Response
<b>GENERAL COMMENTS</b>			
1.	General	After reading the Site 30 Draft Proposed Plan (PP) as a stand-alone document, the reviewer has no sense of the extent of contamination around the daycare center. Figure 3 shows building 502 and the area where debris was removed previously. Are the only areas of concern the area where debris was removed and the area over which the concrete pad was placed? Although there are several references that imply that contamination may be an issue below the building, the reader had no sense about what risk is associated with the soil surrounding the building. Is it high? Is there a playground where children play and may be exposed directly to dioxins? How contaminated is the site?	The text will be reviewed and revised to clarify the fact that daycare center child and worker are not at risk from dioxins. The last paragraph of the Nature and Extent of Contamination section will be revised as follows:  “The extent of dioxins was evaluated by collecting soil sample from areas where contamination was likely to be present, specifically, in areas containing burnt debris. Burnt debris was found in two investigation trenches adjacent to Building 502, in the area now covered by the concrete pad (see figure 3). Samples from these two trenches had elevated concentrations of dioxins. However, the exploratory trenching did not extend under the building for fear of undermining the building. Therefore, the full extent of dioxin beneath the building is unknown. The concrete pad was added as a precautionary measure to prevent exposure to the soil by children at the daycare center. A risk assessment later determined that the dioxins in soil did not present a risk to the children, as discussed in the next section.”
<b>SPECIFIC COMMENTS</b>			
1.	INTRODUCTION, page 1.	<i>Guidance</i> states that the <i>Introduction</i> should identify the Preferred Alternative for remedial action at the site and explain the reasons for its selection. Alternative 2 is not	The preferred alternative will be identified in the introduction.

Document Title: Draft Proposed Plan, Site 30, Daycare Center, Naval Station Treasure Island

Report Date: March 2007

Reviewer: Christine Katin, Environmental Protection Agency Review Date: April 2007

Comment No.	Section/ Page No.	Comment	Response
		identified in the PP as the Preferred Alternative until page 7.	
2.	SUMMARY OF SITE RISKS, Ecological Risk, page 4.	This section states that a “step-wise approach” was used to evaluate impacts to marine receptors. Please define “step-wise approach” or explain the approach generally without using the specific term.	The text will be revised to eliminate the term “step-wise approach” as recommended.
3.	SUMMARY OF REMEDIAL ALTERNATIVES, page 4	The Preferred Alternative is not identified at the beginning of this section, contrary to <i>Guidance</i> . The reader would benefit from knowing the identity of the Preferred Alternative before reading the descriptions of alternatives.	The preferred alternative will be identified in the introduction.
4.	SUMMARY OF REMEDIAL ALTERNATIVES, Description of Alternative 2, page 5.	The first paragraph of this section states that institutional controls “can limit changes to site conditions that may alter exposure mechanisms.” What kind of changes would affect human exposure to contamination? Would the exposure “mechanism” change or would the risk change? Please express this idea clearly, keeping the target audience in mind.	The paragraph will be reworded as follows: “Institutional controls may limit human exposure to potentially contaminated soil by preventing changes or alterations to the building foundation.”
5.	SUMMARY OF REMEDIAL ALTERNATIVES, Description of Alternative 2, page 5.	Please consider revising the first sentence of the second paragraph. As written, the sentence states that there are no unacceptable risks for the use of the site as a daycare center. However, if the proper interpretation of the sentence is that there are no unacceptable risks to <b>human health</b> associated with the contamination at the daycare center, the intended meaning is not being expressed.	The text will be revised as follows:  “The results of the risk assessment indicate that there are no unacceptable risks to human health due to site contaminants for the current and planned future use of Building 502 on Site 30 as a daycare center, even if the concrete pad adjacent to Building 502 is removed.”

**Document Title:** Draft Proposed Plan, Site 30, Daycare Center, Naval Station Treasure Island

**Report Date:** March 2007

**Reviewer:** Christine Katin, Environmental Protection Agency    **Review Date:** April 2007

Comment No.	Section/ Page No.	Comment	Response
6.	EVALUATION OF ALTERNATIVES, Overall Protection of Human Health and the Environment, page 5.	The last paragraph on page 5 states that Alternative 2 ensures that human exposure pathways remain incomplete. Please define "complete" and "incomplete" pathways, either as part of the exposure pathways definition or elsewhere in the document, if the terms must be used.	The text will be revised as follows: "Alternative 2 uses engineering controls and institutional controls to prevent human exposure to contaminants by ..."

**Document Title: Draft Proposed Plan, Site 31, Former South Storage Yard, Naval Station Treasure Island**

**Report Date: March 2007**

Reviewer: Christine Katin, U.S. Environmental Protection Agency

Review Date: April 23, 2007

Comment No.	Section/ Page No.	Comment	Response
<b>SPECIFIC COMMENTS</b>			
1.	Introduction, page 1.	<i>Guidance</i> states that the <i>Introduction</i> should identify the Preferred Alternative for remedial action at the site and explain the reasons for its selection. Alternative 5 is not identified in the Draft Proposed Plan as the Preferred Alternative until page 8.	The preferred alternative will be identified in the introduction.
2.	Site Background, page 2.	The second paragraph of this section states that the land at Site 31 was used as a storage yard, but that the nature of operations is unknown. Please explain.	The text will be revised to remove the phrase “the nature of operations is unknown.”
3.	Summary of Site Risks, Human Health Risk Assessment, page 4.	In general, the fourth paragraph could be improved to avoid misunderstanding. Modeling is used to predict the receptors’ blood-lead levels rather than evaluate their <i>actual</i> blood-lead levels. Please consider revising this paragraph to communicate the information clearly and accurately to the target audience.	The text will be changed as recommended.
4.	Summary of Site Risks, Human Health Risk Assessment, page 4.	The fourth paragraph on this page states that “The modeling results exceeded the targeted level of concern for the child resident.” This is confusing. Did modeling show that the risk to children was unacceptable? Please consider revising the wording for clarity.	The text will be revised to state: “The modeling results indicated a potential risk to child residents from lead.”
5.	Remedial Action Objectives, page 5.	The statement that “exposure pathways for ecological receptors are incomplete” may not be understood by the target audience.	The text is being revised per Water Board comments.

**Document Title: Draft Proposed Plan, Site 31, Former South Storage Yard, Naval Station Treasure Island**

**Report Date: March 2007**

Reviewer: Christine Katin, U.S. Environmental Protection Agency

Review Date: April 23, 2007

Comment No.	Section/ Page No.	Comment	Response
6.	Summary of Remedial Alternatives, page 6.	The Preferred Alternative is not identified at the beginning of this section, contrary to Guidance.	The preferred alternative will be added.
7.	Summary of Remedial Alternatives, Alternative 5, page 6.	The statement that a depth was “conservatively selected to allow for over-excavation in areas of known contamination” may not be understood by the target audience. Does “conservative” mean “health protective” in this statement? Does “over-excavation” mean more excavation than is necessary to remove the contamination? Please revise to suit the target audience.	The text will be revised as follows:  “An excavation depth of 6 feet was selected. This is a conservative depth because the bottom of the excavation is designed to be below the lowest known contamination depth.”
8.	Summary of Remedial Alternatives, Alternative 5, page 6.	The description of Alternative 5, the Preferred Alternative, states that “Construction of a new or replacement schoolyard ... [is] not included in this alternative,” yet the section on the HHRA states that the “existing and planned future use of the site is as an elementary schoolyard.” Does this simply indicate that the costs associated with Alternative 5 do not include reconstruction or does the possibility exist that the use of Site 31 will no longer be as an elementary schoolyard? Please clarify.	The text will be revised to state that the paving at the schoolyard is included in the cost estimate for Alternative 5, as stated in Appendix C of the Feasibility Study. However, replacement of hard surfaces will be a management decision during the remedial design process.

**Document Title: Draft Proposed Plan, Site 30, Daycare Center, Naval Station Treasure Island and Draft Proposed Plan, Site 31, Former South Storage Yard, Naval Station Treasure Island**

**Report Date: March 2007**

Reviewer: Agnes Farres, California Regional Water Quality Control Board, San Francisco Bay Region

Review Date: April 2007

Comment No.	Section/ Page No.	Comment	Response
<b>GENERAL COMMENTS</b>			
1.		Both of the subject reports are generally well written and well organized. However, the Proposed Plans are markedly different in their discussions of ecological risk. Since a similar ecological risk assessment approach was used for both Site 30 and Site 31, they are located adjacent to each other, and both are addressed in the Final Screening-Level Ecological Risk Assessment for Sites 6, 12, 21, 24, 30, 31, 32, and 33, the discussions on ecological risk should be more consistent with each other. My specific comments below highlight where the reports should be revised.	The write-up for the ecological risk assessment will be revised for consistency between the two documents.
2.		The terms <b>ecological risk assessment</b> and <b>Tier I screening-level risk assessment</b> should be included in the glossary of terms in both proposed plans.	The terms will be added to glossaries.
<b>SPECIFIC COMMENTS</b>			
1.	Site 30 PP, pg. 4 Summary of Site Risks 2 <sup>nd</sup> paragraph	This incorrectly states that an ecological risk assessment was not prepared due to the lack of significant ecological habitat. This sentence should be revised and should reference the Final Screening-Level Ecological Risk Assessment for Sites 6, 12, 21, 24, 30, 31, 32 dated March 2007.	The text will be revised as follows:  "Risks to ecological receptors including birds and animals likely to found at the site were evaluated in the <i>Final Screening-Level Ecological Risk Assessment for Sites 6,12,21,24,30,31, and 32, March 2007.</i>
2.	Site 30 PP, pg. 4 Ecological Risk	This paragraph states that a "detailed ecological risk assessment for terrestrial receptors was not conducted" and "a step-wise	The text will be simplified as recommended.

**Document Title: Draft Proposed Plan, Site 30, Daycare Center, Naval Station Treasure Island and Draft Proposed Plan, Site 31, Former South Storage Yard, Naval Station Treasure Island**

**Report Date: March 2007**

Reviewer: Agnes Farres, California Regional Water Quality Control Board, San Francisco Bay Region

Review Date: April 2007

Comment No.	Section/ Page No.	Comment	Response
		approach” was used to evaluate potential impacts to marine receptors instead. Please refer to Specific Comment #1. Also, this sentence should either be clarified to explain what a step-wise approach is, or revised to simply state that potential impacts to marine receptors were evaluated and showed not potential risk.	
3.	Site 31, pg.4 Human Health Risk Assessment, 2 <sup>nd</sup> paragraph	This states that “estimated excess cancer risk for hypothetical child/adult resident and commercial/industrial worker are within the cancer risk management range using the Federal risk calculation method, but above the risk management range using the State method.” Briefly explain the difference between the two calculation methods, why they produced different results, and what can be concluded from the different results.	A brief description of the two calculation methods will be added as follows:  “These two methods differed in the manner in which chemicals and toxicity criteria are selected for use in risk calculations.”
4.	Site 31 PP, pg. 4 Human Health Risk Assessment, 3 <sup>rd</sup> paragraph	This states that contaminants in groundwater did not “contribute significantly” to human health risk and “elevated concentrations” of contaminants were mostly limited to hot spots. This discussion should be placed in the context of a risk management range for consistency (e.g. were concentrations of contaminants in groundwater below the risk management range? Were concentrations of contaminants elevated but still within or above risk management range?).	The text will be revised to state that contaminants in groundwater were below the risk management range.
5.	Site 31 PP, pg. 4 Ecological Risk	Similar to the Site 30 PP and the Site 31 FS, this should include a discussion on the evaluation of potential impacts to marine receptors in San Francisco Bay.	The text will be revised as suggested.

**Document Title: Draft Proposed Plan, Site 30, Daycare Center, Naval Station Treasure Island and Draft Proposed Plan, Site 31, Former South Storage Yard, Naval Station Treasure Island**

**Report Date: March 2007**

Reviewer: Dale Smith, RAB Member

Review Date: April 4, 2007

Comment No.	Comment	Response
<b>COMMENTS</b>		
1.	Under the section "What are the Chemicals of Concern", the definition of dioxins and their effects is not the same for both documents. The description for the daycare center is more complete. It is recognized that space is tight on that page in the Site 31 document, but there are two windows that could be removed through kerning that would allow the addition of the second paragraph from the Site 30 description. One is at the end of the paragraph Remedial Action Objectives and one is on the previous page at the end of the second paragraph.	The dioxin definition will be revised to match the definition for Site 31.
2.	In discussion of the Alternatives for remediation for Site 31, it is stated that fencing would be employed during Alternative 5 remedial activities. Would not fencing be employed during all remedial activities, i.e. Alternatives 3 through 5, not just during Alternative 5 activities?	Yes, fencing would be employed for all excavation activities. The text will be revised accordingly.
3.	Institutional Controls is not defined in the Glossary of Terms for Site 30. The definition for Proposed Plan does not indicate that this is the Navy's recommendation in the section for Site 31. Remedial Action Objectives definition is different in the two documents. Site 30 describes it as a maximum acceptable goal. This should be stated in the description for Site 31 also.	The definitions will be reviewed for consistency and revised accordingly.
4.	Page 11 backs up to page 12 in the proposed Plan for Site 31. This makes for a concise form for the public to fill out and return to the Navy. The Proposed Plan for Site 30 should follow this example and leave page 10 blank.	The revision will be made as suggested.



**TRANSMITTAL/DELIVERABLE RECEIPT**

Contract No. N68711-03-D-5106

Document Control No. BAI . 5106 . 0025 . 0001

TO: Contracting Officer  
 Maria Macam  
 Base Realignment and Closure  
 Program Management Office West  
 1455 Frazee Road, Suite 900  
 San Diego, CA 92108

DATE: 03/07/08  
 CTO: 025  
 LOCATION:  
Naval Station Treasure Island, San Francisco

FROM: V. Saravanan  
**Saravanan (Eli) Vedagiri, Program Manager**

DOCUMENT TITLE AND DATE: **Site 30, Daycare Center and Site 31, Former South Storage Yard, Response to Comments on the Draft Proposed Plan, Naval Station Treasure Island, San Francisco, CA**

TYPE:  Contractual Deliverable  Technical Deliverable (DS)  Other (TC)

VERSION: Final (e.g., Draft, Draft Final, Final) REVISION #: NA

ADMIN RECORD: Yes  No  CATEGORY: Confidential

SCHEDULED DELIVERY DATE: NA ACTUAL DELIVERY DATE: 03/07/08

NUMBER OF COPIES SUBMITTED TO NAVY: 10/3C/6E/1CD  
 O = original transmittal form  
 C = copy of transmittal form  
 E = enclosure  
 CD = compact disc

COPIES TO: (Include Name, Navy Mail Code, and Number of Copies)

NAVY:  
 \*Diane Silva EVR.DS 1C/3E/1CD

Distribution List:  
 Jack Sylvan, Mayor's Office  
 1 Letter

Community RAB Members:  
 Saul Bloom, ARC Ecology 1E

Charles Perry (BOMOW.CP)  
 1C/3E

Gary Foote, Geomatrix 1E

BAI/Tetra Tech:

Maria Macam (BPMOW.MM) 10 +  
 1 Letter

Erika Richard, Kidango 1E

File 1C/1E

James Sullivan (BPMOW.JS)  
 1C + 1 Letter

Jeff Austin, Lennar Communities  
 1E

Marcie Rash, Tetra Tech EMI  
 1C/1E

Randy Brandt, LFR, Inc. 1E

**Regulators:**

Ryan Miya, Cal DTSC 1E  
 Christine Katin, U.S. EPA 1E  
 Paisha Jorgensen, Cal RWQCB 1E  
 Marian Saez, TIDA 1 Letter

**Community RAB Members:**

Nathan Brennan 1E  
 Dale Smith 1E  
 Douglas Ryan 1E  
 Alice Pilram 1E

<b>Date/Time Received</b>
---------------------------