



August 2, 2007  
Project 4850.005.3

Mr. James B. Sullivan  
Mr. James Whitcomb  
Mr. Charles Perry  
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 Draft 2006 Annual Groundwater Status Report: Groundwater  
Monitoring at Petroleum Sites 6 and 25 dated June 11, 2007  
Naval Station Treasure Island  
San Francisco, California

Dear Mr. Sullivan, Mr. Whitcomb and Mr. Perry:

On behalf of the Treasure Island Development Authority (TIDA), Geomatrix Consultants, Inc. (Geomatrix) has reviewed the referenced report (Draft Sites 6 and 25 Annual Groundwater Status Report). Our comments are presented below.

#### GENERAL COMMENTS

- **Toxicity Screening Criteria.** Section 2.4.1 of the Draft Sites 6 and 25 Annual Groundwater Status Report states that toxicity screening criteria have not been established under the NAVSTA TI groundwater monitoring program; however, in Table 4 of the Final Closure Report, Site 6 Request for No Further Action, Naval Station Treasure Island, San Francisco, California (Shaw, 2005),<sup>1</sup> human health risk criteria, including inhalation of indoor air and consumption of aquatic organisms, are presented. Why are human health risks not considered in the Draft Sites 6 and 25 Annual Groundwater Status Report?
- **Define Total Petroleum Hydrocarbons.** In Sections 5.4.1 and 6.4.1, tables present Total Petroleum Hydrocarbon Concentrations during the three sampling events; however, they do not indicate in the associated text that the presented values were generated by adding the purgeable and extractable components.

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<sup>1</sup> Shaw Environmental, Inc., 2005, Final Closure Report, Site 6 Request for No Further Action, Naval Station Treasure Island, San Francisco, California, Revision 0, December 16.



Mr. James B. Sullivan, Mr. James Whitcomb and Mr. Charles Perry  
Department of the Navy  
August 2, 2007  
Page 2

## SITE 6 COMMENTS

- ***Isopropylbenzene (Cumene) and Xylene Toxicity Criteria.*** We concur with the Regional Water Quality Control Board, San Francisco Bay Region comment 1 for Site 6 (RWQCB, 2007)<sup>2</sup> regarding the inclusion of cumene and xylenes in the comparison of groundwater analytical results to risk criteria.
- ***Basis for Decreasing Trend Determination.*** Section 5.5 the text states that the benzene, ethylbenzene, and toluene concentrations “appear to be gradually decreasing over time.” A statistical summary is presented in Table 5-2; however, trend analysis does not appear to be considered. What is the basis of for the determination of the decreasing trends?
- ***Potential Data Bias Due to Limited Wet Season Data.*** We concur with RWQCB Comment 4 for Site 6<sup>2</sup> regarding the potential for bias in data trends due to only one wet season data set being included in the analysis. The wet season data set is elevated relative to the two dry season data sets. As a result, the validity of an assessment of data trends is questionable.
- ***No Threat to Human Health.*** Although the Draft Sites 6 and 25 Annual Groundwater Status Report specifically states that human health risks were not considered in the toxicity screening criteria, Section 5.5 states that groundwater contaminants at Site 6 provide no threat to human health. Given that human health risks were not considered, what is the basis for the statement?

## SITE 25 COMMENTS

- ***Basis for Decreasing Trend Determination.*** Section 6.5 states that the TPH concentrations “appear to be slowly decreasing over time.” A statistical summary is presented in Table 6-2; however, trend analysis does not appear to be considered. As with Site 6, please provide the basis of for the determination that trends are decreasing.
- ***Evidence of Natural Attenuation of Total Petroleum Hydrocarbons.*** Section 6.5 refers to the need for additional monitoring to provide conclusive evidence that the remaining TPH at Site 25 is naturally attenuating. In Section 6.4, reference is made to monitored natural attenuation (MNA) parameters presented in Appendix E of the Draft Sites 6 and 25 Annual Groundwater Status Report; however, the MNA parameter results are not discussed.

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<sup>2</sup> Regional Water Quality Control Board, San Francisco Bay Region, 2007, Water Board Comments on Draft 2006 Annual Groundwater Status Report: Groundwater Monitoring at Petroleum Sites 6 and 25, Naval Station Treasure Island, San Francisco Dated June 2007.



Mr. James B. Sullivan, Mr. James Whitcomb and Mr. Charles Perry  
Department of the Navy  
August 2, 2007  
Page 3

We appreciate the opportunity to review the Draft Sites 6 and 25 Annual Groundwater Status Report. Feel free to contact us if you have any questions.

Sincerely yours,  
GEOMATRIX CONSULTANTS, INC.

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Senior Geologist

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Principal Geologist

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cc: Mr. Jack Sylvan, TIDA  
Ms. Mirian Saez, TIDA  
Mr. Henry Wong, Cal EPA Department of Toxic Substances Control  
Ms. Christine Katin, U.S. Environmental Protection Agency  
Ms. Agnes Farres, Cal EPA Regional Water Quality Control Board