



California Regional Water Quality Control Board

San Francisco Bay Region



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Secretary for
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Arnold Schwarzenegger
Governor

Letter sent via email

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U.S. Department of the Navy
Attn: Mr. Jim Sullivan
BRAC Program Management Office – West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310
via email only: james.b.sullivan2@navy.mil

Subject: Comments on the *Draft Work Plan for Data Gaps Investigation, Installation Restoration Site 6, Former Fire Training School, Naval Station Treasure Island, San Francisco, California*, dated August 31, 2009

Dear Mr. Sullivan:

I have reviewed the August 31, 2009 *Draft Work Plan for Data Gaps Investigation, Installation Restoration Site 6, Former Fire Training School (Draft Work Plan)*. My comments are presented below.

COMMENTS

Comment #1 – Document Formatting Problem

There is a problem with the text formatting throughout the document in which words are broken up to maintain the right-hand justification. As a result, the document is difficult to read. Please correct this in future versions of the document.

Comment #2 - Section 2.5 (Current Land Use and Proposed Reuse), page 2-5

The most appropriate document to be cited regarding proposed reuse is the 1996 City and County of San Francisco *Naval Station Treasure Island Reuse Plan – Public Review Draft*.

Comment #3 - Section 5.2.5 (Groundwater Sample Collection), page 5-4

Please describe the construction of existing well 06-MW1 so that the temporary well construction approach can be better evaluated. Also, based on the wording of this section, the temporary well screen lengths might exceed 10 feet; this would conflict with the language in Sampling and Analysis Plan (SAP) Worksheet #11.4.

Comment #4 – Figure 4 (Proposed Soil Sampling Locations for Dioxins)

For locations TP004 (east of former building 464, adjacent to the wastewater treatment plant) and TP013 (northern portion of Site 6), what is the rationale for not proposing soil sampling

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locations to define the lateral extent to the north?

Comment #5 – Figure 6 (Proposed Soil Sampling Locations for TPH, UST 248A-D Area)

In the northwestern portion of Site 6, there are two deep soil sample locations where total petroleum hydrocarbon (TPH) results exceed the residential screening level. What is the rationale for not proposing soil sampling near these locations?

Comment #6 – Figure 8 (Proposed Temporary Well Locations)

Monitoring well 06-MW1 has been sampled more recently than 2004. Please add the more recent TPH results for well 06-MW1 to this figure beneath the January 2004 result.

Comment #7 – SAP Worksheet #11.2 (Project Quality Objectives and Systematic Planning Process Statements for Data Gap 2 – Delineation of TPH and Petroleum-Related Compounds in Soil), page 52 of 147 and SAP Worksheet #17 (Sampling Design and Rationale), page 81 of 147.

These worksheets state that “Additional headspace measurements may be collected, at the discretion of the field team leader, based on site conditions such as visible staining or noticeable petroleum odor.” Field screening such as headspace measurements should be performed and documented where there is visible staining or petroleum or other unknown odors.

Please contact me at (510) 622-2445 or rsteenson@waterboards.ca.gov if you have any questions.

Sincerely,



Digitally signed by Ross
Steenson
Date: 2009.09.30 09:04:02
-07'00'

Ross Steenson, PG, CHG
Engineering Geologist
Groundwater Protection Division

Cc (via email only):

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