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Governor

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NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA – DRAFT WORK PLAN FOR WELL DECOMMISSIONING

Dear Mr. Sullivan:

Thank you for the opportunity to comment on the *Draft Work Plan for Well Decommissioning* (Work Plan), dated December 13, 2010. The Department of Toxic Substances Control (DTSC) has received and reviewed the Work Plan. Based on our review we have the following comments:

General Comments

1. The Navy should sample and analyze groundwater from at least one well for radiological contaminants (Radium-226 at a minimum) at each Site (Sites 10, 14, 22, 25, D1B, D4B and Building 180) before decommissioning in order to obtain data from each area regarding any potential radiological contamination.
2. Figures 3 through 9 show the wells proposed for decommissioning at each site. However, these figures do not show the locations of other wells in the vicinity of the sites making it difficult to evaluate the adequacy of the remaining monitoring network. Please add the locations of all wells to the site-specific figures.

Specific Comments

3. Section 2.0 - Facility Description. Sections 2.1 through 2.7 provide background information for each site and the last paragraph summarizes the number of wells to be decommissioned. The second to the last paragraph of Section 2.3, Site D1B – 3rd Street Site, indicates that the Regional Water Quality Control Board concurred with the no further action alternative proposed by the Navy and provides an important context and justification for the well decommissioning. In contrast, the last paragraph for all the other sections only summarize the number of proposed wells for decommissioning, but does not discuss the status or proposed plans for each site. Therefore, please describe the status and/or plans for each site at the end of each section.
4. Section 2.4 - Site D4B The text indicates that “Site D4B included a former dry cleaning operation at Building 99.” This section focuses on petroleum hydrocarbons, but the text does not discuss the potential release of volatile organic compounds (VOCs) from the former dry cleaning operation. Historic dry cleaning operations are commonly associated with VOC releases to soil, soil vapor, and groundwater. Please revise this section to include additional discussion about previous VOC analytical results at the site.
5. Section 4.2 - Well Decommissioning An additional paragraph should be added to this section to address issues summarized in the California Department of Water Resources (DWR), Water Well Standards, Chapter II, Section 23, Requirements for Destroying Wells, F. Temporary Cover. Specifically, the following text should be included in the revised document: "During periods when no work is being done on the well, such as overnight or while waiting for sealing material to set, the well and surrounding excavation, if any, shall be covered. The cover shall be sufficiently strong and well enough anchored to prevent the introduction of foreign material into the well and to protect the public from a potentially hazardous situation."
6. Section 8 - Schedule The text indicates that “The field work is scheduled to occur in January and February 2011.” In contrast, Figure 10 shows that field work is scheduled to start on 2/21/11 and finish on 3/8/11. The text and figures should be revised / updated for consistency.
7. Table 1: Wells Proposed For Decommissioning Table 1 lists common well and borehole parameters, but does not indicate whether the casing and/or screen is constructed of PVC, stainless steel or other materials. If the wells and/or screens are constructed of materials other than PVC, than the proposed hollow-stem auger method of over-drilling the borehole may not be suitable for decommissioning. Please modify the text and/or table to indicate the materials

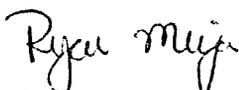
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used to construct the wells and describe alternative decommissioning procedures, if applicable.

8. Appendix A - Well Decommissioning Log A new row or entry for the "Volume of borehole to be grouted" should be added to the Original Well Data section. This additional information will facilitate a quick comparison of estimated borehole volume versus actual grout volume and help to identify potential problems or discrepancies during the field operations.

If you have any questions, please contact me at 510-540-3775 or by e-mail at rmiya@dtsc.ca.gov.

Sincerely,



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Senior Hazardous Substances Scientist
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