



California Regional Water Quality Control Board

San Francisco Bay Region



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TREASURE ISLAND
SSIC NO. 5090.3.A

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File No. 2169.6013 (AF)

Mr. Charles Perry
U.S. Department of the Navy
BRAC Program Management Office – West
1455 Frazee Rd., Suite 900
San Diego, CA 92108-4310

SUBJECT: Water Board comments on Site 30 Daycare Center Draft Proposed Plan & Site 31 Former South Storage Yard Draft Proposed Plan, Naval Station Treasure Island, San Francisco

Dear Mr. Perry:

Upon review of the subject reports, I have the following comments. If you have any questions, you can contact me via phone (510) 622-2401 or email at AFarres@waterboards.ca.gov.

General Comments:

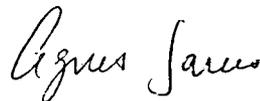
1. Both of the subject reports are generally well written and well organized. However, the Proposed Plans are markedly different in their discussions of ecological risk. Since a similar ecological risk assessment approach was used for both Site 30 and Site 31, they are located adjacent to each other, 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.
2. The terms **ecological risk assessment** and **Tier 1 screening-level risk assessment** should be included in the glossary of terms in both proposed plans.

Specific Comments:

1. *Site 30 PP, pg. 4 Summary of Site Risks, 2nd 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, and 33* dated March 2007.

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 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 no potential risk.
3. *Site 31 PP, pg. 4 Human Health Risk Assessment, 2nd 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.
4. *Site 31 PP, pg. 4 Human Health Risk Assessment, 3rd 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?).
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.

Sincerely,



Agnes Farres
Project Manager

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