



California Regional Water Quality Control Board

San Francisco Bay Region



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Secretary for
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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 the Pre-Draft Action Memorandum/Interim Remedial Action Plan: Non-Time Critical Removal Action for Solid Waste Disposal Areas Installation Restoration Site 12 Old Bunker Area, Naval Station Treasure Island, San Francisco

Dear Mr. Perry:

Upon review of the subject report, 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.

1. Pg. 2, 1st paragraph states “The potential risk to human health at IR Site 12 does not warrant an emergency or time-critical removal action (TCRA) because the SWDAs are unoccupied...” According to Figure 3, there are five buildings adjacent to the SWDAs that appear to be occupied (Buildings 1325, 1211, 1213, 1235 and 1237). Verify whether these buildings are unoccupied and revise this statement accordingly.
2. Section 5.1.1.7 states that fabric will be placed at the bottom of excavated areas. Explain what type of fabric will be placed and its purpose.
3. Section 5.1.1.7 describes site restoration activities that will take place after excavation. Provide more information on reseeded the common areas (e.g. type of seed mix, application method) and what types of trees will be planted. Reseeding of the common areas and tree planting will likely occur after the rainy season. Describe any maintenance plans to be implemented to ensure that the reseeded common areas and planted trees become established (e.g. irrigation). Also describe erosion control methods and explain how “erosion control will be developed to aid the growth of native vegetation” (typically, planting vegetation is a form of erosion control).

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4. In Section 2.1.3, the description of Alternative 3 states the largest volume of chemical- and solid waste-contaminated soil would be removed under this alternative. Verify the accuracy of this statement since areas under hardscape are excluded under Alternative 3. Because this is the chosen alternative, it is important to state the reasons for choosing this alternative clearly and accurately.
5. Pg. 14 (last paragraph) and Pg. 27 (second paragraph) both state the chosen alternative will take approximately six months to implement. However, the project schedule (Section 5.1.6) states it will take approximately seven months. Since this action will directly impact residents on TI, it is important to provide the most accurate information possible on the duration of these impacts. Please address the contradictory language in the report.

Sincerely,



Agnes Farres
Project Manager

Enclosure

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