



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
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Arnold Schwarzenegger
Governor

Letter sent via email

Date: December 27, 2010
File No. 2169.6013 (RAS)
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U.S. Department of the Navy
Attn: Mr. Jim Sullivan
BRAC Program Management Office – Wes:
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310
Via email only: james.b.sullivan2@navy.mil

Subject: Comments on the *Draft Treatability Study Report, In Situ Anaerobic Bioremediation Pilot Study at IR Site 21, Naval Station Treasure Island, San Francisco*, dated November 17, 2010

Dear Mr. Sullivan:

I reviewed the November 17, 2010 *Draft Treatability Study Report, In Situ Anaerobic Bioremediation Pilot Study at IR Site 21 (Draft Treatability Study Report)*. My comments on the document are as follows:

COMMENTS

1. Section 1.1 (Background)

Is there a particular reason why the *Draft Site 21 Remedial Investigation Report* is cited in the fifth paragraph, rather than the final version of the same report?

2. Section 1.4 (Scope of Work)

Based on the verb tense used in the text of the bullets, this language appears to be from a work plan. Please confirm that each of these tasks was actually accomplished. Also, in the fourth bullet, second sentence, the phrase “will be” should be replaced with “was.”

3. Section 3.2.1 (Groundwater Extraction)

Please review the sentence “A groundwater extraction system utilizing educators to pump water was constructed on site.” It appears that “educators” should replace the underlined word. Please conduct a word search throughout the document and correct as appropriate.

4. Section 4.5.4 (Remaining Volatile Organic Compounds Plume)

Please indicate which pathways are addressed with the cited remedial goals. The text cites Table 4.1 of the *Focused Feasibility Study Report (Final?)*, but it is not clear whether the remedial goals are based on the vapor intrusion pathway.

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5. Section 6.2 (Recommendations)

The *Draft Treatability Study Report* concludes “Based on the results of the treatability study no further remedial actions are needed at Site 21.” This strong, broad conclusion needs to be more clearly supported (e.g., see also Comment #4). While the distribution of residual VOC concentrations supports the conclusion that there is no continued migration towards the Bay, it is unclear whether these residual VOC concentrations could pose a potential vapor intrusion concern given that a portion of Site 21 is planned for future residential use (see Figure 11 - 2008 Conceptual Land Plan CERCLA and Petroleum Sites in the *2010 Final Site Management Plan*). In addition, I understand that the Navy recently has conducted soil gas sampling at Site 21. These data are pertinent to reaching any final conclusion regarding the vapor intrusion pathway. At a minimum, the document should acknowledge that these data have been collected. Ideally, these data should be incorporated into the report.

6. TIDA Comment Letter Dated December 21, 2010

In conjunction with my review of the *Draft Treatability Study Report*, I also reviewed the AMEC Geomatrix letter dated December 21, 2010 and prepared on behalf of the Treasure Island Development Authority (TIDA). I concur with the provided comments.

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

Sincerely,



Digitally signed by
Ross Steenson
Date: 2010.12.27
13:41:47 -08'00'

Ross Steenson, PG, CHG
Engineering Geologist
Groundwater Protection Division

Cc (via email only):

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