

Kimberly Noble

From: Sunga, Remedios@DTSC <Remedios.Sunga@dtsc.ca.gov>
Sent: Thursday, February 04, 2016 01:36 PM
To: Kimberly Noble
Cc: Forman, Keith S CIV NAVFAC HQ, BRAC PMO; Clark, David J CIV NAVFAC SW; Zech, Myriam@Waterboards; Chris Glenn; William Carson; bob.beck@sfgov.org
Subject: TI Site 32 ROD/Final RAP - DTSC Comments
Importance: High

Hi Kimberly,

The following are DTSC's comments on the *Draft Installation Restoration Site 32, Former Training and Storage Area, Record of Decision/Final Remedial Action Plan, Naval Station Treasure Island, San Francisco, California* (ROD/Final RAP) dated December 22, 2015. DTSC received the ROD/Final RAP on December 28, 2015, and the Navy requested comments by February 5, 2016.

1. Footnote 1, Page 1. Please change "ROD/RAP" and "ROD" to "ROD/Final RAP" in the footnote and in Section 2.5.4, Attachment D, and Attachment E.
2. Section 2.1- Site Description and History, Pages 3 and 4.
 - 2.1 Please include a figure showing the location of Site 32 within Treasure Island (TI) since most discussion relates to TI.
 - 2.2 Please discuss the source of the total petroleum hydrocarbon (TPH) contamination at Site 32.
 - 2.3 Please discuss the reasons for the significant delay in issuing the ROD/Final RAP after the Proposed Plan/Draft RAP was finalized.
3. Section 2.2- Site Characteristics, Page 5. Please discuss other site-specific characteristics such as surface cover, groundwater use, weather conditions, etc.
4. Table 1-Previous Investigations and Cleanup Actions, Page 7. Please change "Proposed Plan" to "Proposed Plan/Draft RAP" in Table 1 and Sections 2.7, 2.8, and 3.0.
5. Section 2.4-Current and Potential Future Land and Resources Uses, Pages 7-9. Please provide more emphasis on the current reuse plan by discussing the features of the Northern Shoreline Park and including a redevelopment land use figure.
6. Section 2.5.1.5-Results of HHRA, Page 11.
 - 6.1 Second Paragraph: Please delete the last sentence since the Site 32 remedial goals in the TSCA removal action were for unrestricted land use supporting the decision of No Further Action.
 - 6.2 Last Paragraph: Please change "His" to "HIs"

7. Page 13. Please insert a new section after Section 2.5.2-Screening Level Ecological Risk Assessment to identify the chemical contaminants and the cleanup goals that were established for the TSCA cleanup action. This new section should discuss the chemicals that were addressed during the TSCA cleanup action, in addition to PCBs.
8. Section 2.5.3-TSCA Cleanup Action, Page 13.
 - 8.1 First Paragraph: Lead is included in the list of chemicals that were addressed during the TSCA cleanup action but it was not listed as a CPOC in Table 2. Please see Comment #7 for a new section identifying all chemical contaminants that were addressed during the cleanup action.
 - 8.2 Second Paragraph: This paragraph states *“Cleanup goals were established in the work plan as part of the TSCA cleanup action. However, EPA and DTSC updated risk-based screening levels for some chemicals after the work plan was finalized.”* Please include a table with the chemical contaminants and cleanup goals in the TSCA work plan and the updated screening levels to support the statements in this section.
9. Section 2.5.4-Historical Radiological Assessment Supplemental Technical Memorandum (HRASTM), Page 14. Please discuss the transfer of the USS Pandemonium training ship from Site 12 to Site 32 that classified Site 32 as radiologically impacted. The relocated ship at Site 32 was named Pandemonium Site II (NE) in the HRASTM.
10. Section 2.6-Basis of the No Further Action Decision, Page 14. Please clarify that the potential radiological contamination at Site 32 will be addressed in a Final Status Survey Report and that the Navy will seek a no further action or unrestricted release of Site 32 from the California Department of Public Health (CDPH) that provides technical support to DTSC on radiological contamination .
11. Section 2.8-Community Participation, Pages 14 and 15.
 - 11.1 Please specify that, in addition to fact sheets and newsletters, work notices are also distributed for upcoming field work.
 - 11.2 Please include the following DTSC’s EnviroStor website address and access instructions for Site 32 documents. <https://www.envirostor.dtsc.ca.gov/public/>
Enter “San Francisco” as the City, scroll down and select “Naval Station Treasure Island/Site 32-Former Training and Storage Area” and click on the link “Activities” to view final documents.
 - 11.3 Please discuss the public noticing of the ROD/Final RAP in the newspaper after it has been signed and published.

Thank you – Medi

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