

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
1 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704

June 23, 1988

Commanding Officer
Naval Station Treasure Island
Building 1 (Code 70)
San Francisco, CA 94130-5000
(Attn: Mr. Kam Tung)

Dear Mr. Tung:

DRAFT SITE STUDY - SOUTH PIER UTILITIES PROJECT

The Department has reviewed the above draft site study dated December 28, 1987. Our comments are provided below.

- (1) The report does not define the boundary of the study area.
- (2) There is no documented QA/QC procedures presented in the report. Lab reports show some sample I.D. as "TRIPBLANK" indicating the lab had prior knowledge of which samples are trip blanks.
- (3) Curtis & Tompkins Ltd., San Francisco, is not certified by the State for EPA tests 8240 (for VOC) and 6010 (for metals).
- (4) Criteria used to assess the extent of contaminations are vague (such as "metal concentration are relatively low") and sometimes erroneous (such as the use of Soluble Threshold Limit Concentration (STLC) to define hazards).

We recommend that the Navy:

- (1) clearly defines the boundary of the study area.
- (2) describes QA/QC procedures according to the field work conducted during sampling.
- (3) resamples for VOC and metals for locations where no further action is recommended and sent the samples to a lab that is certified for EPA tests 8024 and 6010 by the State.
- (4) Conducts health based risk assessment to either justify the no further action recommendation or derive a cleanup level for remediation.

If you have any questions please contact Chein Kao at (415) 540-3052.

Sincerely,



Howard Hatayama, Chief
Site Mitigation Unit
North Coast California Section
Toxic Substances Control Division

cc: Roger James, RWQCB
Jeny Clifford, EPA Region IX
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CK:krf