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From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: SUITABILITY STUDY OF FLOATING ^{PRODUCT} REMOVAL FOR NAVAL
STATION, TREASURE ISLAND

Encl: (1) Minutes of the meeting on 10 Jan 1992

1. Enclosure (1) minutes of the meeting held in Department of Toxic Substances Control office for the Suitability Study of Floating Product Removal at Naval Station, Treasure Island.
2. Thank you for your guidance and involvement in this study. For further information please contact Mr. Ernesto M. Galang, Code 1813EG, at Commercial (415) 244-2560.

Original signed by:
GILBERT A. RIVERA
Head, Installation Restoration Section

Distribution:
California Department of Toxic Substances Control (Attn: Guillermo Montes)
California Regional Water Quality Control Board (Attn: Barbara Smith)
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SAN FRANCISCO OFFICE

Date : January 21, 1992
 To : Ernest Galang, EIC
 Navy Western Division
 From : Emily Pimentel, Project Manager
 Subject : Minutes to Meeting on Suitability Study of Floating Product Removal,
 Naval Station Treasure Island

A meeting was held on January 10, 1992, to address regulatory agency comments from the San Francisco Bay Regional Water Quality Control Board (RWQCB) and the California Department of Toxic Substance Control (DTSC) on the "Suitability Study of Floating Product Removal" report prepared by PRC under contract task order (CTO) 0141. Meeting attendees are listed on Exhibit 1 and an agenda prepared by PRC is provided as Exhibit 2.

The meeting began with an explanation of the scope of work for CTO 0141. The scope was intended to determine the suitability of using existing wells for removal of floating product by pumping. The reason for addressing this approach was because regulatory agency comments in the past had requested that an expedient method to remove floating product be proposed. The study was not intended to evaluate other alternatives for floating product removal, nor was it intended to remediate fuel saturated in soil or fuel dissolved in ground water.

PRC proposed that future remediation of the fuel farm area (FFA) and fire training area (FTA) be addressed in two phases. Phase I would include floating product removal. Phase II would include remediation of contaminated soil and ground water. As appropriate, tank removal could be addressed as part of Phase I or Phase II. Furthermore, PRC recommended addressing all petroleum-derived contamination outside the Installation Restoration (IR) Program. This effort could begin by providing the respective agencies with a summary of all petroleum-related underground storage tank (UST) and above-ground investigations completed, underway, or anticipated at Treasure Island. The investigations would be pulled out from the scope of existing work plans for the RI/FS (prepared under CTO 15) and addressed under separate CTOs. The applicable regulations would include the UST regulations under the Resource Conservation and Recovery Act (RCRA) and the Clean Water Act Spill Prevention Control and Contingency (SPCC) regulations. In order to evaluate the recommendation to address a phase I and phase II study, PRC presented the results of the subject report.

The FFA consists of above-ground tanks 4, 5, and 6, and seven USTs (tanks 1-7). Currently, only the seven USTs are in operation. Floating product of about 1-inch thickness is present in the vicinity of the above-ground tanks. The wells at this site were deemed unsuitable for floating product removal because they could not be located or had crooked casings.

The FTA consists of four USTs (tanks A, B, C, and D). Tanks A and B are not in use and are planned for removal under CTO-127. Tanks C and D are currently in operation, though it is anticipated they will be placed out of service in the next 7 to 8 months because by that time construction will be completed at the new FTA. Floating product of about 4-5 inch thickness is

present below tanks C and D. All wells at this site were deemed suitable for floating product removal.

The available chemical data for both the FFA and FTA were used only to assist in confirming the area of suspected contamination.

The DTSC noted that use of a French drain system would perhaps be more effective than pumping. PRC agreed that it was possible and that this alternative should be considered in any actual efforts to remove floating product.

The RWQCB commented that they would like to see some immediate action taken to remove floating product. They agreed that development of a plan to consolidate all petroleum-derived contamination should be addressed outside the Superfund process since the regulations for petroleum-derived contamination address cleanup expediently.

RWQCB desired theoretical agreement that some action would be taken by Navy to begin a removal action at FFA and FTA to cleanup floating product and as necessary remove soil, any tanks, and associated concrete pads if necessary to access floating product. The RWQCB indicated that plume "chasing" of contaminated ground water would be addressed at a later date. There was general agreement by the RWQCB, DTSC and Navy; however, Navy expressed their reservation in actually being able to go forward with this because of funding and contractor mobilization constraints. Navy agreed to explore initiating a removal action under a separate CTO. Additionally, a tentative schedule was developed that included submittal of a project plan, for a new CTO, for agency review after 11 weeks from January 10, 1991. The agencies agreed that they could provide comments back to Navy within one week. Consequently, removal action in the field could begin in April 1992.

EXHIBIT 1

SUITABILITY STUDY OF FLOATING PRODUCT REMOVAL
MEETING ATTENDEES
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
NAVAL AIR STATION TREASURE ISLAND

10 JANUARY 1992
10:00 A.M., DTSC BERKELEY

PERSONNEL	ORGANIZATION	PHONE NUMBER
1. Ernie Galang	WESTDIV	(415) 244-2560
2. Guillermo Montes	DTSC	(510) 540-3809 phone mail (510) 540-3455
3. Stanley Sun	DTSC	(510) 540-3762
4. Barbara M Smith	RWQCB	(510) 464-4222
5. Ken Bowen	PRC	(415) 543-4880
6. James Sullivan	NAVSIA Treasure Island	(415) 395-5454
7. Emily Puntel	PRC	415 543-4880
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16.		

AGENDA
CTO 0141

Review of the Report
"Suitability Study of Floating Product Removal."
Naval Station Treasure Island, San Francisco, California.

January 10, 1991

Items to Discuss

1) Scope of Work of CTO 0141.

- Determine suitability of using existing wells as product recovery well.
- No soil or ground-water remediation intended under CTO 0141.

2) Proposed Future Remediation Under UST Program.

- Phase I Remediation
- Phase II Remediation (new CTO)
- Tanks Removal

3) Status of Existing Monitoring Wells and Piezometers.

- Fire Training Area (FTA).
- Fuel Farm Area (FFA).
- Use of Piezometers as monitoring wells; Limitations of chemical data use.
- Summary of wells.

4) Approach to Floating Product Removal in Well 6 at FTA.

5) Extent of Contamination at FTA and FFA.